# Business Responsibility & Sustainability Report

### SECTION A: GENERAL DISCLOSURES

#### I. Details of the listed entity

- 1. Corporate Identity Number (CIN) of the Listed Entity: L72200KA1999PLC025564
- 2. Name of the Listed Entity: Mindtree Limited
- 3. Year of incorporation: 05 August 1999
- 4. Registered office address: Mindtree Ltd, Global Village, RVCE Post, Mysore Road, Bengaluru-560059, Karnataka, India
- 5. Corporate address: Mindtree Ltd, Global Village, RVCE Post, Mysore Road, Bengaluru-560059, Karnataka, India
- 6. E-mail: investors@mindtree.com
- 7. Telephone: +91 80 6706 4000
- 8. Website: www.mindtree.com
- 9. Financial year for which reporting is being done: 01 April 2021 31 March 2022
- 10. Name of the Stock Exchange(s) where shares are listed: National Stock Exchange of India Limited (NSE) (Stock Symbol: MINDTREE) and BSE Limited (Stock Code: 532819)
- 11. Paid-up Capital: 1,648 million
- 12. Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report:

Paneesh Rao Global Head of Sustainability +91 80 67064000 sustainability@mindtree.com

# 13. Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e., only for the entity) or on a consolidated basis (i.e., for the entity and all the entities which form a part of its consolidated financial statements, taken together):

Disclosures made in this report are on a standalone basis and pertain only to Mindtree Limited ("Mindtree"). It covers all global operations for economic category performance disclosures and our social and environmental performance disclosures pertaining to India operations, where our largest employee-base, social and environmental impacts lie.

### II. Products/Services

14. Details of business activities (accounting for 90% of the turnover):

S. No	Description of Main Activity	Description of Business Activity	% Of Turnover of the entity
1	Information and communication (J8)	Other information & communication service activities	100%

15. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):

S. No	Product/Service	NIC Code	% Of Turnover of the entity
1	IT Services	62099	100%

#### III. Operations

#### 16. Number of locations where plants and/or operations/offices of the entity are situated:

Location	Number of plants	Number of offices	Total
National	Not Applicable	16	16
International	Not Applicable	35	35

Please refer to our website for details: https://www.mindtree.com/about/locations

#### 17. Markets served by the entity:

#### a. Number of locations

Locations	Number
National (No. of States)	7
International (No. of Countries)	23

#### b. What is the contribution of exports as a percentage of the total turnover of the entity?

95% of the total turnover of Mindtree's business is export.

### c. A brief on types of customers

Industries served section in this annual report covers the details of our customer segments.

### IV. Employees

Mindtree has Full time Employees (FTE) and sub-contractors. The Company does not have any workers. Accordingly, workers related information is not applicable.

While we are transgender-inclusive with recent recruitment (six people) into our talent pool, this BRSR follows the template given by SEBI with conventional M/F categorization and total count including them in data reporting.

### 18. Details as at the end of Financial Year:

### a. Employees and workers (including differently abled):

		Total	М	Male		Female	
S.No.	Particulars	(A)	No. (B)	% (B / A)	No. (C)	% (C / A)	
		EMPLO	YEES				
1	Permanent (D)	35,071	23,650	67.43%	11,415	32.55%	
2	Other than Permanent (E)	5,116	3,530	69.00%	1,586	31.00%	
3	Total employees (D + E)	40,187	27,180	67.63%	13,001	32.35%	

#### b. Differently abled Employees and workers:

		Total	Male		Female					
S.No.	Particulars	(A)	No. (B)	% (B / A)	No. (C)	% (C / A)				
	DIFFERENTLY ABLED EMPLOYEES									
1	Permanent (D)	48	42	87.50%	6	12.50%				
2	Other than Permanent (E)	0	0	0.00%	0	0.00%				
3	Total differently abled employees (D + E)	48	42	87.50%	6	12.50%				

### 19. Participation/Inclusion/Representation of women

S.No.	Particulars	Total	No. and percentage of Females		
		(A)	No. (B)	% (B / A)	
1	Board of Directors	11	2	18.18%	
2	Key Management Personnel	2	Nil	Nil	

#### 20. Turnover rate for permanent employees and workers

		FY 2021-22		FY 2020-21			FY 2019-20		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Permanent Employees	27.6%	25.9%	27.0%	12.80%	10.70%	12.10%	17.90%	16.20%	17.40%

V. Holding, Subsidiary and Associate Companies (including joint ventures)

21. (a) Names of holding / subsidiary / associate companies / joint ventures

S.No.	Name of the holding/subsidiary/ associate companies/ joint ventures (A)	Indicate whether holding/ Subsidiary/ Associate/ Joint Venture	% Of shares held by listed entity	Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No)	
1	Larsen and Toubro Limited	Holding	60.99%	No	
2	Mindtree Software (Shanghai) Co. Ltd.	Subsidiary	100%	No	
3	Bluefin Solutions Sdn. Bhd	Subsidiary	100%	No	

### VI. CSR Details

### 22. (i) Whether CSR is applicable as per section 135 of Companies Act, 2013: (Yes/No) Yes

- (ii) Turnover: ₹ 79,678 million
- (iii) Net worth: ₹ 43,186 million
- (iv) CSR threshold limit : ₹ 168 million
- (v) CSR spend: ₹ 171 million

### VII. Transparency and Disclosures Compliances

### 23. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:

	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)		FY 2021-22		FY 2020-21		
Stakeholder group from whom complaint is received		Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Communities	Yes. Project execution team appointed by the NGO partner working on the ground.	Nil	Nil	Nil	Nil	Nil	Nil
Investors* (other than shareholders)	NA	NA	NA	NA	NA	NA	NA
Shareholders	Yes, Mindtree has a designated e-mail ID, <u>investors@mindtree.com</u> and centralized web- based complaints redress system called "Scores".	28	Nil	Nil	31	Nil	Nil

			FY 2021-22		FY 2020-21		
Stakeholder group from whom complaint is received	Grievance Redressal Mechanism in Place (Yes/No) (If yes, then provide web-link for grievance redress policy)	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks	Number of complaints filed during the year	Number of complaints pending resolution at close of the year	Remarks
Employees and workers	Yes, we have an internal mechanism MindSpeak	168	Nil	Nil	247	Nil	Nil
Customers	Yes, escalation matrix provided with various modes including tool- based system.	Nil	Nil	Nil	Nil	Nil	Nil
Value Chain Partners	Yes, escalation matrix provided in contracts	Nil	Nil	Nil	Nil	Nil	Nil
Other (please specify)	NA	NA	NA	NA	NA	NA	NA

\* The Company has only category of Investor - Equity shareholder. Hence this is not applicable.

### 24. Overview of the entity's material responsible business conduct issues

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format:

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
1	Environmental & CSR norms	Risk (R)	New laws related to environment and CSR activities are being enacted globally. Adherence to these new laws poses challenge.	<ul> <li>Mindtree monitors all regulatory requirements on regular basis. Concerned teams along with in-house compliance team ensures adherence to all statutory requirements. These areas are also covered under the internal audit program from a compliance point of view. As part of sustainability reporting, independent assessments conducted also ensures the gaps, if any, are addressed.</li> <li>Mindtree is ISO 14001 certified which covers the adherences to environmental norms.</li> </ul>	Negative Implication

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S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)
2	Climate change	Risk (R)	Climate change can impact our operations due to extreme weather conditions like cyclones, heatwave, and floods, to name a few events that have the potential to create severe disruptions.	<ul> <li>Mindtree has done a hazard risk analysis &amp; the impact of severe climate changes may take time to materialize. Currently, our centers are climate controlled and has business continuity plans to counter any disruptions.</li> <li>Mindtree increases awareness by sending mailers to Minds &amp; partners of the affected locations. Thereby ensuring effective communications for all affected stakeholders along with possible resolutions.</li> <li>Various initiatives implemented across</li> </ul>	Negative Implication
			<ul> <li>facilities to control GHG emissions due to energy consumption &amp; Waste generation.</li> <li>Tool for disruptive event identification across Mindtree locations has been established that helps in early identification.</li> </ul>		
3	Scarcity of water	Risk (R)	Some of the locations that Mindtree has presence might have issues with water shortage. In case of norms being imposed on water supply, there might be an adverse impact.	<ul> <li>Major locations such as Bengaluru &amp; Chennai where the ground water is depleting, the cost of procuring water and non-supply of water will become a highrisk event. Mindtree continues to adopt water conservation strategies across all the existing facilities and also supplement internal water generation by procuring water from outside agencies.</li> <li>Rainwater harvesting system implemented at few facilities helps in increasing the ground level water. This results in release of sub soil water from recharge pits, and this reduces the dependency on external agencies.</li> </ul>	Negative Implications
				<ul> <li>Sustainability team runs awareness campaigns to ensure that all Mindtree Minds are aware of the risk related to water shortage.</li> </ul>	

S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	Rationale for identifying the risk/ opportunity	In case of risk, approach to adapt or mitigate	Financial implications of the risk or opportunity (Indicate positive or negative implications)			
4	Waste Management	Risk (R)	Improper disposal of waste will lead to non-compliance of laws and result in	<ul> <li>All the hazardous, biomedical and E-waste are disposed as per the regulations to authorized state pollution control board partners for recycling/ destruction.</li> </ul>	Negative Implications			
			GHG emission.	<ul> <li>All other mixed solid waste (Dry/wet) is disposed to authorized vendor for recycling/ reuse.</li> </ul>				
				<ul> <li>Organic waste converting machines are installed at few facilities to convert food waste into manure and the manure is used as fertilizers for landscaping.</li> </ul>				
							<ul> <li>The generated construction waste is reused for laying roads thus reducing waste reaching to landfill.</li> </ul>	
				<ul> <li>Generated metal waste is used for constructing handrails to access overhead tanks thus reusing the waste within the facility.</li> </ul>				
5	Ecological Impacts	Risk (R)	Depletion/ shortage of natural resources like fossil fuel,	• In most of the facilities, we use third party generated wheeling energy & in-house solar power for electricity.	Negative implications			
		pollution due to	pollution due to man-made & natur conditions will impact business	pollution due to man-made & natural conditions will impact business	pollution due to man-made & natural conditions will impact business	man-made & natural conditions will impact business	<ul> <li>Moreover, mitigation and sustainability programs like conservation of energy (Installation of energy efficient equipment         <ul> <li>LED installation, UPS &amp; PAC units' optimization &amp; Usage of renewable resources) are in place.</li> </ul> </li> </ul>	
				<ul> <li>Programs on conservation of water (Installation of efficient aerators at taps, Rainwater harvesting &amp; usage of recycled water) have been implemented.</li> </ul>				
				<ul> <li>Additionally, optimizing transport management to reduce GHG emissions, WELL certification of facilities and safe workplace are brought in.</li> </ul>				
				• Adequate Business continuity plans on the identified disruptive events are also in place.				

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S. No.	Material issue identified	Indicate whether risk or opportunity (R/O)	whether Rationale for isk or identifying the popportunity risk/ opportunity In case of risk, approach to adapt or mitigate				
6	Regulations Compliance	Risk (R)	The multiplicity of laws, regulations, and local statutes across the globe makes adherence to each a challenge for any IT company today. We carry the risk of non- compliance in the geographies where we operate, due to changing regulations.	<ul> <li>We have a dedicated in-house compliance team that manages compliance globally.</li> <li>We also engage with specialist consultants across the globe who support us in adhering to country-specific compliance and regulatory requirements.</li> <li>We have a data privacy team under a Data Protection Officer to implement our global data privacy framework which includes mandatory privacy training for Mindtree Minds.</li> </ul>	Negative implications		
7	Crisis Management	Risk (R)	<ul> <li>Any major crisis, will impact</li> <li>Business operations</li> <li>Safety of Minds</li> <li>Financial implications</li> <li>Customer satisfaction</li> </ul>	<ul> <li>Established Global Crisis Management Team to handle any crisis</li> <li>Crisis response plans</li> <li>Regular testing exercise</li> <li>Disaster recovery plan</li> <li>Account level Business continuity plans</li> </ul>	Negative Implication		
8	Supply Chain Sustainability	Opportunity (O)	This is an opportunity to contribute to business as well as social and environmental sustainability. Mindtree has identified and leveraged the potential of green procurement as a value creation source.	<ul> <li>Exploiting the capabilities of the Supplier 360 tool- our supplier portal launched during FY20 evolved during the year, spreading its reach globally, and bringing complete supplier visibility into view. The traction was accentuated by the pandemic, and early benefits in terms of time and efficiencies was noted. All PO-invoice transactions are now virtual globally under this portal which has been an important part of our 'Go Green' concept. Efforts are being expended to digitalize the entire process thereby benefiting the environment as a whole by reducing the usage of hardcopies.</li> </ul>	Positive Implication		

### SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

This section is aimed at helping businesses demonstrate the structures, policies and processes put in place towards adopting the NGRBC Principles and Core Elements.

The National Guidelines for Responsible Business Conduct (NGRBC) as prescribed by the Ministry of Corporate Affairs advocates nine principles referred to as P1-P9 as given below:

Principle	Description
P1	Businesses should conduct and govern with integrity, ethics, transparency, and accountability.
P2	Businesses should provide goods and services in a manner that is sustainable and safe.
Р3	Businesses should respect and promote the well-being of all employees, including those in the value chain.
P4	Businesses should respect the interests of and be responsive towards all the stakeholders.
P5	Businesses should respect and promote human rights.

Principle	Description
P6	Businesses should respect, protect, and make efforts to restore the environment.
P7	Businesses should engage in influencing public and regulatory policy responsibly and transparently.
P8	Businesses should promote inclusive growth and equitable development.
P9	Businesses should engage with and provide value to their consumers in a responsible manner.

Disclosure Questions	Р 1	Р 2	Р 3	Р 4	Р 5	Р 6	Р 7	Р 8	Р 9
		Ро	licy and manag	gement proces	ses				
1.a. Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
b. Has the policy been approved by the Board? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	Yes
c. Web Link of the Policies, if available*	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	Yes
2 Whether the entity has translated the policy into procedures. (Yes / No)	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	Yes
3. Do the enlisted policies extend to your value chain partners? (Yes/No)	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	Yes
4. Name of the national and international codes/cer- tifications/labels/ stan-	Nil	CMMI 2.0 L5(Dev and SVC)	ISO 45001:2018		Nil	ISO 45001:2018	NA	Nil	CMMI 2.0 L5(Dev and SVC)
dards (e.g., Forest Stew- ardship Council, Fairtrade, Rainforest Alliance, Trus-		ISO 20000- 1:2018	WELL-HSR	ISO 9001:2015		ISO 14001:2015			ISO 20000- 1:2018
tea) standards (e.g., SA 8000, OHSAS, ISO, BIS)		ISO 27001:2013							ISO 27001:2013
adopted by your entity and mapped to each principle.		SSAE18							SSAE18
		ISO 27701:2019							ISO 27701:2019
		ISO 9001:2015							ISO 22301:2019
		ISO 22301:2019							Cyber Essen- tials
		Cyber Essentials							

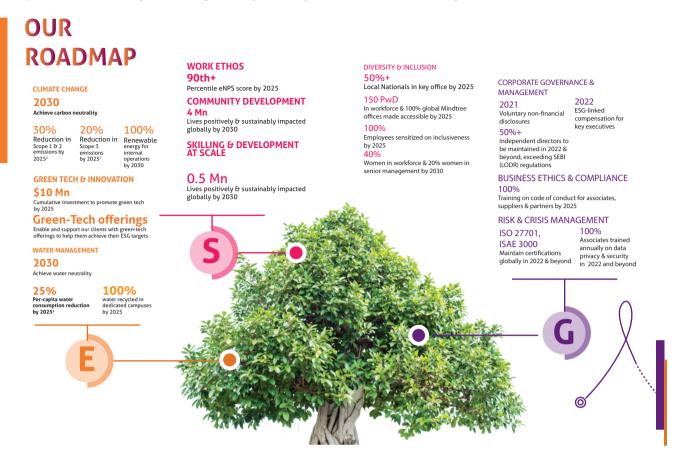
\*Policy details and web links

P1	Ethics & Transparency	Mindtree's several policies published externally and internally elucidate ethical behavior, transparency, and accountability.
		Whistleblower Policy
		https://www.mindtree.com/sites/default/files/2021-02/Whistleblower-Policy.pdf
		Nomination & Remuneration Policy
		https://www.mindtree.com/sites/default/files/2020-11/Nomination-and-Remuneration-policy. pdf
		Anti-Slavery and Anti-Human Trafficking Statement
		https://www.mindtree.com/sites/default/files/2020-04/modern-slavery-statement-mindtree.pdf
		Code of conduct – BoDs & Senior Management
		https://www.mindtree.com/about/investors/code-conduct-directors-senior-management-and-
		independent-directors
		Policy for Determining Material Related Party Transactions
		https://www.mindtree.com/about/investors/policies/policy-determining-material-related-party- transactions
		Anti-Bribery and Anti-Corruption Policy
		https://www.mindtree.com/sites/default/files/2022-03/Anti-Bribery-and-Anti-Corruption.pdf
		Internally published - Integrity Policy, Code of Conduct for Employees, Anti-Money Laundering Policy
P2	Service Responsibility	Mindtree believes that sustainable production and consumption are interrelated, contributing to enhanced quality of life, and protecting and preserving the earth's natural resources.
		Sustainability Policy
		https://www.mindtree.com/sites/default/files/2021-01/mindtree-sustainability-policy.pdf
		Environmental Health & Safety Policy
		https://www.mindtree.com/sites/default/files/2020-11/EHS-Policy.pdf
		Code of conduct – BoDs & Senior Management
		https://www.mindtree.com/about/investors/code-conduct-directors-senior-management-and- independent-directors
		Internally published - Integrity Policy, Code of Conduct for Employees, Supplier Code of Conduct
P3	Human Resources	Mindtree has various policies to support employee well-being.
		Equal Opportunity Policy
		https://www.mindtree.com/sites/default/files/2017-12/Equal%20Opportunity%20Policy%20 New.pdf
		Equal Employment Opportunity Policy
		https://www.mindtree.com/sites/default/files/2022-03/Equal-Employment-Opportunity-Policy. pdf
		Environmental Health & Safety Policy
		https://www.mindtree.com/sites/default/files/2020-11/EHS-Policy.pdf
		Internally published - Non-discrimination Policy, Prevention of Sexual Harassment Policy, Grievance Redressal Policy, Maternity leave policy, Human Rights Policy, Sabbatical Policy,
		Reasonable Accommodation Policy (to aid differently-abled)

P4	Responsive to Stakeholders	Mindtree recognizes that businesses have a responsibility to maximize the positive impacts and minimize and mitigate the adverse impacts of its services, operations, and practices on all their stakeholders.
		Policy for Determining Material Information https://www.mindtree.com/about/investors/policies/policy-determining-material-information
		Policy for Determining Material Related Party Transactions https://www.mindtree.com/about/investors/policies/policy-determining-material-related-party- transactions
		CSR Policy
		https://www.mindtree.com/about/investors/policies/policy-corporate-social-responsibility
		Sustainability Policy
		https://www.mindtree.com/sites/default/files/2021-01/mindtree-sustainability-policy.pdf
		Internally published - Supplier Code of Conduct
P5	Human Rights	The Code of Conduct details the policy with respect to human rights. Mindtree, through its Human Rights Statement, upholds human rights as enshrined in the Constitution of India and supports the principles in the United Nations' Universal Declaration of Human Rights.
		Whistleblower Policy
		https://www.mindtree.com/sites/default/files/2021-02/Whistleblower-Policy.pdf
		Anti-Slavery and Anti-Human Trafficking Statement
		https://www.mindtree.com/sites/default/files/2020-04/modern-slavery-statement-mindtree.pdf
		Equal Opportunity Policy
		https://www.mindtree.com/sites/default/files/2017-12/Equal%20Opportunity%20Policy%20 New.pdf
		Equal Employment Opportunity Policy
		https://www.mindtree.com/sites/default/files/2022-03/Equal-Employment-Opportunity-Policy. pdf
		Internally published - Human Rights Policy, Code of Conduct, Prevention on Sexual Harassment Policy.
P6	Restore Environment	Environmental responsibility is a prerequisite for sustainable economic growth and for the well-being of society. Mindtree adopts environmental practices and processes that minimize or eliminate the adverse impacts of its operations across the value chain. In addition, employees are sensitized against wasteful usage of natural resources and conserve energy.
		Sustainability Policy
		https://www.mindtree.com/sites/default/files/2021-01/mindtree-sustainability-policy.pdf
		Environmental Health & Safety Policy
		https://www.mindtree.com/sites/default/files/2020-11/EHS-Policy.pdf
P7	Public Advocacy	While Mindtree may share its expertise to help in the formulation of public policy, it does not directly engage in lobbying or advocacy activities and hence, does not have a specific policy for this purpose.
P8	Inclusive Growth	Our Corporate Social Responsibility charter encompasses activities focused on the marginalized and vulnerable sections of the society. Mindtree contributes to the overall development with a specific focus on disadvantaged, vulnerable and marginalized communities.
		Corporate Social Responsibility Policy
		https://www.mindtree.com/about/investors/policies/policy-corporate-social-responsibility
		Sustainability Policy
		https://www.mindtree.com/sites/default/files/2021-01/mindtree-sustainability-policy.pdf
Р9	Customer Engagement	Mindtree believes that businesses should engage with customers and provide value in a responsible manner.
		Internally published - Code of Conduct

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5. Specific commitments, goals and targets set by the entity with defined timelines, if any.



#### 6. Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met.

ESG section in this annual report shares the details of our performance against the specific commitment, goals, and targets. We are progressing well to achieve our ambitious ESG vision. We shall continue to build on our capabilities and successes and set out on our next growth curve armed with upskilled and engaged talent pool, thriving communities, efficient sustainability practices, and industry leading economic performance to deliver triple bottom lined and sustained value to all our stakeholders.

Our externally assured annual sustainability report developed in accordance with the Comprehensive criteria of Global Reporting Initiative (GRI) Standards shares the additional details of our performance along with the needed KPIs (https://www.mindtree.com/sustainability-report).

#### Governance, leadership and oversight

# 7. Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements

Refer Integrated Annual report for Leadership messages.

8.	Details of the highest authority responsible for	i. Name: Paneesh Rao
	implementation and oversight of the Business Responsibility policy (ies).	ii. Designation: Global Head of Sustainability
		iii. Telephone number: +91 80 67064000
		iv. e-mail ID: <u>sustainability@mindtree.com</u>

 Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No). If yes, provide details.

Yes, our Board of Directors review and approve strategic directions and initiatives, and take cognizance of issues, forces, and risks that define and drive the Company's long-term performance. The Board members actively discuss various ESG initiatives of the Company and encourage the senior management to take steps beyond regulatory requirements. The Board of Directors constitute the Board level CSR Committee, with an Independent Director being the Chairperson of the Committee, which presently consists of four Directors with one Executive Director (CEO) and three Independent Directors. In turn, it is delegated to the Global Head – Sustainability to monitor the activities undertaken and supervise the sustainability function.

### 10. Details of Review of NGRBCs by the Company:

Subject for Review	Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee									•	ually er – p									
	P1	P2	P3	Ρ4	P5	P6	P7	P8	P9	P1	P2	P3	P4	P5	P6	P7	P8	P9		
Performance against above policies and follow up action	Y	Y	Y	Y	Y	Y	NA	Y	Y	A	А	А	А	А	А	NA	A	А		
Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances	Y	Y	Y	Y	Y	Y	NA	Y	Y	Q	Q	Q	Q	Q	Q	NA	Q	Q		

# 11. Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.

P1	P2	Р3	P4	P5	P6	P7	P8	P9
No								

No external agency assessment, however internal reviews and assessments happen periodically and stringently.

#### 12. If answer to question (1) above is "No" i.e., not all Principles are covered by a policy, reasons to be stated:

Questions	P1	P2	P3	P4	P5	<b>P6</b>	P7	P8	P9
The entity does not consider the principles material to its business (Yes/No)	-								
The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No)									
The entity does not have the financial or/human and technical resources available for the task (Yes/No)					-	-			
It is planned to be done in the next financial year (Yes/No)									
Any other reason (please specify)							*		

\* P7 – Advocacy Policy: While Mindtree may share its expertise to help in the formulation of public policy, it does not directly engage in lobbying or advocacy activities and hence, does not have a specific policy for this purpose.

#### SECTION C: PRINCIPLE WISE PERFORMANCE DISCLOSURE

This section is aimed at helping entities demonstrate their performance in integrating the Principles and Core Elements with key processes and decisions. The information sought is categorized as "Essential" and "Leadership". While the essential indicators are expected to be disclosed by every entity that is mandated to file this report, the leadership indicators may be voluntarily disclosed by entities which aspire to progress to a higher level in their quest to be socially, environmentally, and ethically responsible.

# PRINCIPLE 1: Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable

#### **Essential Indicators**

#### 1. Percentage coverage by training and awareness programmes on any of the principles during the financial year:

Segment	Total number of training and awareness programmes held	Topics covered under the training and its impact	%age of persons in respective category covered by the awareness programmes
Board of Directors*	Business ethics and compliance module has six courses	Data Privacy, Insider Trading, Prevention of Sexual Harassment, Integrity, Intellectual Property, Information Security Awareness	NA
Key Managerial Personnel	Business ethics and compliance module has six courses	Data Privacy, Insider Trading, Prevention of Sexual Harassment, Integrity, Intellectual Property, Information Security Awareness	100%
Employees other than BoDs and KMPs	Business ethics and compliance module has six courses	Data Privacy, Insider Trading, Prevention of Sexual Harassment, Integrity, Intellectual Property, Information Security Awareness	99.5%

\* Independent Directors undergo Familiarization programmes and please refer to the below link:

https://www.mindtree.com/sites/default/files/2019-12/details-of-familiarization-programme-for-independent-directors.pdf

 Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):

		Monetary			
	NGRBC Principle	Name of the regulatory/ enforcement agencies/ judicial institutions	Amount (In INR)	Brief of the Case	Has an appeal been preferred? (Yes/No)
Penalty/ Fine	None	NA	Nil	NA	No
Settlement	None	NA	Nil	NA	No
Compounding fee	None	NA	Nil	NA	No
		Non- Monetary			
	NGRBC Principle	Name of the regulato agencies/ judicial institution		Brief of the Case	Has an appeal been preferred? (Yes/No)
Imprisonment	None	NA		NA	No
Punishment	None	NA		NA	No

3. Of the instances disclosed in Question 2 above, details of the Appeal/Revision preferred in cases where monetary or non-monetary action has been appealed.

Case Details	Name of the regulatory/ enforcement agencies/ judicial institutions
None	NA

### 4. Does the entity have an anti-corruption or anti-bribery policy? If yes, provide details in brief and if available, provide a weblink to the policy.

Yes, Mindtree has a well-defined policy on Anti-Bribery and Anti-Corruption. It is our primary responsibility to conduct all business activities with utmost honesty, integrity, and the highest possible ethical standards; administering that, we do not involve in bribery or corruption in any of our operations. This policy extends to all stakeholders or persons associated with Mindtree and who may be acting on behalf of Mindtree and sets code of conduct that must be adhered to at all times. All Mindtree Minds mandatorily undergo training on Anti-Bribery and Anti-Corruption. The policy is available on the company's website at : https://www.mindtree.com/sites/default/files/2022-03/Anti-Bribery-and-Anti-Corruption.pdf

# 5. Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:

	FY 2021-22	FY 2020-21
Directors	Nil	Nil
KMPs	Nil	Nil
Employees	Nil	Nil

### 6. Details of complaints with regard to conflict of interest:

	FY 2021-22		FY 2020	-21
	Number	Remarks	Number	Remarks
Number of complaints received in relation to issues of Conflict of Interest of the Directors	Nil	Nil	Nil	Nil
Number of complaints received in relation to issues of Conflict of Interest of the KMPs	Nil	Nil	Nil	Nil

7. Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.

None

#### Leadership Indicators

1. Awareness programmes conducted for value chain partners on any of the principles during the financial year:

Total number of awareness programmes held	training	%age of value chain partners covered (by value of business done with such partners) under the awareness programmes
Nil	Nil	Nil

### 2. Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No) If yes, provide details of the same.

Yes, the Company has a policy for Determining Material Related Party Transactions to ensure that there is no conflict of interest inflicting any apprehension in the minds of its stakeholders, the Company's Board, which may arise during the course of its business activities. The same is available at <a href="https://www.mindtree.com/about/investors/policies/policy-determining-material-related-party-transactions">https://www.mindtree.com/about/investors/policies/policy-determining-material-related-party-transactions</a>.

All related party transactions are entered with the prior approval of Audit Committee. All related party transactions are at arm's length and in the ordinary course of business. Further, the Company also has a Code of Conduct in place for Directors, Senior Management, and Independent Directors, which affirms them to disclose the potential conflicts of interest that they may have regarding any matters that may come before the Board. The Directors disclose their interest in other entities annually and periodically, as and when there are changes, and the same is noted by the Board.

#### PRINCIPLE 2: Businesses should provide goods and services in a manner that is sustainable and safe

#### **Essential Indicators**

1. Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of Products/ Services and processes to total R&D and capex investments made by the entity, respectively.

	FY 2021-22	FY 2020-21	Details of improvement in environmental and social impacts
R&D	Nil	Nil	Nil
Сарех	0.32%	0.21%	UPS Optimization, LED, VFD installation & PAC unit replacement to conserve energy and installation of efficient aerators at tap to conserve water.

Note: Capex investment at organization level includes total additions to Property, Plant and Equipment (PPE) and intangible assets.

#### 2. a. Does the entity have procedures in place for sustainable sourcing? (Yes/No)

Procurement at Mindtree aligns totally with the organization's sustainability focus, the green infrastructure imperatives, and the organization-wide application of sustainability. This implies green procurement, with its screening criteria based not only on quality and cost but also on the environmental impacts of purchase and usage over long time horizons.

Mindtree strives to apply green procurement objectives to its overall procurement strategy and is involved actively in identifying and generating green alternatives to traditional purchasing. We actively engage with and influence our supplier ecosystem towards better sustainability. We believe in helping our supply chain partners to inculcate sustainable practices and processes in their operations too. Going forward, we are stepping up our efforts in influencing this task in a more tangible way. Our procurement strives to factor in responsible practices in its processes as it looks forward to influencing the supply chain towards better sustainability.

Our supplier code of conduct includes the normative clauses on EES parameters such as labor (child labor, forced or compulsory labor), working conditions at supplier sites, and protection of the environment. It outlines our commitment to make our supply chain more responsible and sustainable. As part of our environment/ sustainable practices, we have agreed with OEM partners, like our laptop suppliers, to not use Thermocol and Styrofoam for packaging. For all purchases, we have specifically incorporated sustainable guidelines as part of Purchase Order terms.

#### b. If yes, what percentage of inputs were sourced sustainably?

Sustainability sourcing percentage as a % of our hardware spend is 67%.

# 3. Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for (a) Plastics (including packaging) (b) E-waste (c) Hazardous waste and (d) other waste.

Mindtree being an IT Services Company, does not reclaim any products from waste for reusing/recycling.

As an environmentally responsible organization, we approach waste management not only through systems and technology routes but also through advocacy and sensitization – thereby influencing behavioral change. Reduce- Reuse- Recycle has been our mantra for waste management. Our waste recycling percentage has improved despite the increasing scale of business.

**Plastic waste:** Non-biodegradable plastic waste generated within our establishments is sorted out safely and discarded to designated vendors for recycling/ reuse.

**E-waste:** All electronic waste generated within Mindtree premises is discarded within 180 days in accordance with e-waste management rules and is handed over to vendors approved by State Pollution Control Board (SPCB) for recycling. Recycling certificates are obtained from the respective vendors once the process has been completed to ensure safe disposal. Employees have an option to buy back the laptop after five years, thereby reducing the e-waste being sent for disposal. We also donate laptops in good condition to schools through the Mindtree Foundation.

Hazardous waste: All hazardous waste is disposed through the SPCB-authorized vendor as per the regulatory requirements.

**Other waste:** Biodegradable food waste is treated onsite for manure generation through composting. The resultant manure is used for our campus landscape.

4. Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No). If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards? If not, provide steps taken to address the same.

No. Extended Producer Responsibility is not applicable to Mindtree's activities.

#### Leadership Indicators

1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?

NIC Code	Name of Product / Service	% of total Turnover contributed	Boundary for which the Life Cycle Perspective / Assessment	Whether conducted by independent external agency (Yes/No)	Results communicated in public
62099	Mindtree undergoes CMMI assessment and ISO certifications for development, maintenance and testing projects where complete lifecycle of projects is covered.	100%	Cradle-to-grave	Yes	Refer below link

Link: https://pgplus.bsigroup.com/CertificateValidation/CertificateValidator. aspx?CertificateNumber=IS+538550&RelssueDate=11%2f05%2f2021&Template=india\_en

2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.

Name of Product /Service	Description of the risk/concern	Action Taken
No significant social or environmental impact	NA	NA

3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).

Not Applicable

- 4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed. Not Applicable
- 5. Reclaimed products and their packaging materials (as percentage of products sold) for product category.

Not Applicable

PRINCIPLE 3: Businesses should respect and promote the well-being of all employees, including those in their value chains

#### **Essential Indicators**

#### 1. a. Details of measures for the well-being of employees:

Category					% Of en	nployees co	overed by				
	Total Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities		
	(A)	Number (B)	% (B/ A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
					Permanent	employee	5				
Male	23,650	23,650	100%	23,650	100%	NA	NA	23,650	100%	NA	NA
Female	11,415	11,415	100%	11,415	100%	11,415	100%	NA	NA	11,415	100%
Total	35,071	35,071	100%	35,071	100%	11,415	100%	23,650	100%	11,415	100%

#### **Business Responsibility & Sustainability Report**

Category	% Of employees covered by										
	Total	Health insurance		Accident insurance		Maternity benefits		Paternity Benefits		Day Care facilities	
	(A)	Number (B)	% (B/ A)	Number (C)	% (C / A)	Number (D)	% (D / A)	Number (E)	% (E / A)	Number (F)	% (F / A)
				Othe	er than Perm	anent emp	loyees				
Male	3,530	3,530	100%	3,530	100%	NA	NA	NA	NA	NA	NA
Female	1,586	1,586	100%	1,586	100%	NA	NA	NA	NA	NA	NA
Total	5,116	5,116	100%	5,116	100%	NA	NA	NA	NA	NA	NA

Note: Insurance for our sub-contractors is provided by the respective vendor who would place these sub-contractors at Mindtree. This is mandatory  $\vartheta$  part of the contract signed between Mindtree  $\vartheta$  vendor. We do not cover sub-contractors for maternity, paternity, and day care benefits.

### 2. Details of retirement benefits, for Current FY and Previous Financial Year

Benefits	FY 20	21-22	FY 2020-21			
	No. of employees covered as a % of total employees	Deducted and deposited with the authority(Y/N/N.A.)	No. of employees covered as a % of total employees	Deducted and deposited with the authority(Y/N/N.A.)		
PF	100%	Y	100%	Y		
Gratuity	100%	Y	100%	Y		
ESI	NA	NA	NA	NA		
SSC	100%	Y	100%	Y		

### 3. Accessibility of workplaces

# Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016? If not, whether any steps are being taken by the entity in this regard.

Yes, the premises/ offices of the entity are accessible to differently-abled employees, as per the requirements of the Rights of Persons with Disabilities Act, 2016. Our offices have been designed with a strong emphasis on inclusivity and accessibility, as the office spaces are equipped with wheelchair parking areas, height-adjustable workstations, access ramps at entrances, and specially built washrooms with grab bars for support. We continue improving the infrastructure at all our campuses to enable universal access for persons with disabilities. Mindtree believes in going beyond what is mandated by law. We have a reasonable accommodation policy that enables those with special needs to enjoy the benefits and privileges of employment equal to those enjoyed by similarly situated people without such needs.

### 4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016? If so, provide a weblink to the policy.

Yes, Mindtree has an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016. As an inclusive employer, Mindtree actively encourages the recruitment, development, and retention of people with disabilities, provides equal opportunity in the workplace, and is committed to providing a safe, accessible, and healthy work environment. Recruitment of people with disabilities, in addition to providing necessary and customized support to help them realize their potential, is encouraged at Mindtree. We also support Mindtree Minds who have acquired disabilities during their employment. This policy is available on Mindtree's website. https://www.mindtree.com/sites/default/files/2017-12/Equal%200pportunity%20Policy%20New.pdf

Besides this policy, we also have an equal employment opportunity policy. The link to access this policy is as follows. <u>https://www.mindtree.com/sites/default/files/2022-03/Equal-Employment-Opportunity-Policy.pdf</u>

#### 5. Return to work and Retention rates of permanent employees and workers that took parental leave.

Gender	Permanent	Permanent employees				
	Return to work rate	Retention rate				
Male	100%	91%				
Female	99%	84%				
Total	100%	89%				

6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker? If yes, give details of the mechanism in brief.

	Yes/No (If yes, then give details of the mechanism in brief)
Permanent Employees	Yes, Mindtree Minds can share their concerns and grievances through Mind Speak (Grievance Redressal Policy), which is internally published. This policy ensures that any grievance related to fairness and equity among Mindtree Minds are logged, tracked, and responded to within a defined SLA. Mindtree, as a company, is committed to a non-vindictive environment. Mindtree guarantees every Mindtree Mind that they would not be at risk, nor their employment jeopardized for raising a concern under this policy.
	In addition, the Whistleblower Policy provides a formal platform to share grievances on various matters. This policy allows whistleblowers to report real or perceived unethical acts related to violations of related laws, such as the Code of Integrity, PIT, and Fair Disclosure. This policy is introduced to new hires as part of the induction program.
	The POSH (Prevention of Sexual Harassment) Policy aims to prevent and provide redressal for sexual harassment incidents. This policy is internally published and is applicable to all Mindtree Minds, regardless of whether they work part-time or full-time, consultants, contract staff, sub-contractors, clients, visitors, suppliers, customer's employees, vendor's employees, and any other individual in relation to any work-related activity.
Other than Permanent Employees	Yes, other than permanent employees of Mindtree are also entitled to share their grievances through the Whistle blower and POSH Policy.

### 7. Membership of employees and worker in association(s) or Unions recognized by the listed entity:

Category		FY 2021-22			FY 2020-21		
	Total employees / workers in respective category (A)	No. of employees / workers in respective category, who are part of association(s) or Union (B)	% (B / A)	Total employees / workers in respective category (C)	No. of employees / workers in respective category, who are part of association(s) or Union (D)	% (D / C)	
Total Permanent Employees	35,071	Nil	0%	23,814	Nil	0%	
- Male	23,650	Nil	0%	16,151	Nil	0%	
- Female	11,415	Nil	0%	7,663	Nil	0%	

### 8. Details of training given to employees and workers:

Category		FY 2021-22			FY 2020-21					
	Total (A)	On Health and C safety measures				Total (D)	On Health and safety measures		On Skill upgradation	
		No. (B)	% (B/ A)	No. (C)	% (C / A)		No. (E)	% (E / D)	No. (F)	% (F / D)
	_				Employees			Ť		
Male	27,180	2,663	9.80%	25,805	92.56%	17,909	1,173	6.55%	17,540	97.94%
Female	13,001	1,073	8.26%	12,926	99.42%	8,235	637	7.73%	8,127	98.69%
Total	40,187	3,736	9.30%	38,731	94.76%	26,144	1,810	6.92%	25,667	98.18%

### 9. Details of performance and career development reviews of employees and worker:

Category	FY 2021-22					
	Total (A)	No. (B)	% (B/A)	Total (C)	No. (D)	% (D/C)
			Employees			
Male	16,259	15,885	97.7%	13,537	12,681	93.7%
Female	7,301	7,051	96.6%	6,191	5,751	92.9%
Total	23,560	22,937	97.3%	19,728	18,432	93.4%

#### 10. Health and safety management system:

# a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No). If yes, the coverage such system?

Yes, Mindtree has implemented Occupational health and safety management system. Mindtree is certified for ISO 45001 – Occupational Health and Safety. EHS (Environment, Health & Safety) policy has been established with coverage across all locations. It describes our philosophy and commitment towards managing key aspects of HSE. Internal audits are conducted biannually, and external audits take place on a yearly basis by third party.

Detailed risk assessment has been done for all the operations within the facility, and appropriate control measures are implemented to mitigate the identified risks/hazards. All our buildings are equipped with firefighting systems. Employees and contractual staff receive regular training through various simulation exercises to raise their safety awareness. Safety posters are displayed across the premises to create awareness among employees.

We understand that employee well-being is essential to maintaining our leading business performance. We constantly update and improve the range of physical, mental, and emotional support we provide to our employees. The pandemic created a new challenge for us – to engage and connect with our Mindtree Minds beyond work. Several trainings and workshops were conducted by various well-being experts and medical practitioners.

The coronavirus pandemic presents an unprecedented global health challenge. An extensive health, safety, and people engagement program has been implemented for Mindtree Minds. This includes hospitalization, isolation and medical support, wellness counseling services, best practices for employees and workplace safety, travel restrictions, awareness, and COVID-specific insurance coverage for Mindtree Minds and their dependents.

#### b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?

Risk assessment has always been an integral part of Mindtree's Health and Safety Management System and includes the identification of hazards, the complexity of the operations, suitability of the methodologies of risk assessment, workplace conditions, and expert guidance. We conduct periodic as well as annual assessments of our campuses/ offices as a part of this process.

A process has been established for Hazard Identification & Risk Assessment. All the hazards/ risks arising out of the operations of a facility including routine and non-routine activities are identified and scored based on three parameters (Frequency & duration, severity & likelihood, and the number of people affected). Detailed risk assessment has been done for all the operations within the facility, and appropriate control measures are implemented to mitigate the identified risks/ hazards. The routine activities include all planned ones like routine checks of equipment such as UPS, HVAC, DG, operation of pumps, housekeeping operations etc. Activities like renovation of buildings, new installation of equipment and any other unplanned activities are the ones done on non-routine basis.

Mindtree is highly aware that the perimeter for health and safety responsibility has increased many folds now, extending to WFH (Work-From-Home) context. Mindtree took necessary precautions at the offices, which included sanitization of all office premises, removal of biometric scanners, installation of thermal scanners, daily communication updates, restricted movements in common areas, closure of recreational facilities, and avoidance of large gatherings. Mindtree made the best use of the 'zero occupancy period' to research how to safe-proof and future-proof the organization for the new normal. Our awareness and safety training relevant to the COVID context included internal and external training, including our partners. A plethora of measures was implemented to enhance the health and safety of the people in the workplace.

#### c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N)

Not applicable

#### d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)

All our employees and their families (including spouses, children, and parents/ in-laws) have access to non-occupational medical and healthcare services. As per the agreement signed with all our "sub-contractor vendors," it is mandatory for the vendor to provide non-occupational medical & healthcare services to all the subcontractors deployed at Mindtree locations all over India.

#### 11. Details of safety related incidents, in the following format:

Safety Incident/Number	Category	FY 2021-22	FY 2020-21
Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)	Employees	0.19	1.75
Total recordable work-related injuries	Employees	4	21
No. of fatalities	Employees	Nil	Nil
High consequence work-related injury or ill-health (excluding fatalities)	Employees	Nil	Nil

#### 12. Describe the measures taken by the entity to ensure a safe and healthy workplace.

At Mindtree, our top priority has always been to ensure the safety and health of our team while safeguarding the interests of the communities in which we operate and the clients we serve. Throughout the year, we have strived to keep the health and safety of Mindtree Minds at the forefront as we grapple with the pandemic. Our Global Facility Management Team has stepped up readiness for Mindtree Minds returning to the office so that they feel safe in the workplace. There have been key infrastructure enhancements to ensure adequate sanitization stations, minimal contact with bare surfaces, thermal scanning at key access areas, and effective prompts to maintain social distancing.

Mindtree is ISO 45001 certified. We follow the OHS Framework principles at all our facilities in India and are OHSMS certified by the British Standards Institute for our EHS policy. Our EHS Policy covers all our locations and people - permanent employees, contractual employees, and vendors. We comply with all applicable health and safety regulations. Mindtree has occupational health and safety key matrix with regular monitoring of OHS compliance, near-miss recordings, incident recordings, lost time injury recordings, ergonomics, monitoring and measurement, and training & awareness.

This year, we catered to pandemic-related wellness by addressing physical, emotional, and intellectual aspects of caring. We conducted various programs covering various topics, training our people in comprehensive wellbeing, promoting healthy behaviors and safety, preventing, and mitigating several health and safety risk impacts. We covered all our people with our health and safety policies, procedures, benefits, and special care extended during the pandemic.

#### 13. Number of Complaints on the following made by employees and workers:

		FY 2021-22		FY 2020-21		
	Filed during the year	Pending resolution at the end of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks
Working Conditions	Nil	Nil	Nil	Nil	Nil	Nil
Health & Safety	Nil	Nil	Nil	Nil	Nil	Nil

#### 14. Assessments for the year:

	% Of your plants and offices that were assessed (By entity or statutory authorities or third parties)
Health and safety practices	All Mindtree India locations undergo third party assessments and are certified for ISO 45001 and WELL HSR
Working Conditions	0%

# 15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.

At Mindtree, we have established Environmental Health and Safety policy and emphasize on the importance of maintaining a safe and healthy workplace for all employees & partners who work on our premises. In-house EHS team monitors all the health & safety measures implemented on ground to ensure there is no deviations from the set process. To Identify hazards/ risks within the premises, Hazard identification and risk assessment is done prior to each activity, and it is reviewed periodically. To mitigate the identified hazards/risks appropriate control measures are implemented. In addition to the risk assessment, we have established incident reporting process at our facilities, where all the employees, partners, visitors, and clients can report any hazard/risk they identify through Genie or Green cards. The incidents are tracked, and correction & corrective actions are taken to ensure safe working place. Awareness on emergency preparedness is given to employees periodically and training are conducted to partners as per the schedule to create awareness on health & safety.

At our headquarters at Bengaluru, to prevent flooding into campus during heavy rain, we have influenced the builder and constructed the compound wall which is twelve meter high from the ground level to prevent the entry of water into the premises. All damaged electric insulation mats are replaced at electrical panel rooms. The height of identified earth pits in the facility were increased for easy maintenance work to prevent physical/physiological injuries. At Bhubaneswar facility, Handrails were constructed for the ladders accessing overhead tanks to ensure safety and avoid slip and fall injuries.

#### **Leadership Indicators**

# 1. Does the entity extend any life insurance or any compensatory package in the event of death of (A) Employees (Y/N) (B) Workers (Y/N)?

Yes, 100% of our employees have life insurance coverage. Mindtree covers medical expenses, if any, and extends life insurance in the event of the death of employees. Mindtree provides employees with outstanding health benefits, some of which are available to their families. In addition to affordable health insurance, Mindtree provides benefits such as retirement provisions (provider funds, gratuity), group term life insurance, parental leave, stock ownership, personal accident insurance, superior maternity support programs, nutrition, psychological counseling, health plan incentives, etc.

2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.

We conduct a quarterly vendor audit, with the help of outsourced auditors to check and ensure that the statutory dues have been deducted and deposited appropriately by the vendors.

3. Provide the number of employees / workers having suffered high consequence work- related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:

	workers		No. of employees/workers that are rehabilitated and plac in suitable employment or whose family members have t placed in suitable employment		
	FY 2021-22	FY 2020-21	FY 2021-22	FY 2020-21	
Employees	Nil	Nil	Nil	Nil	

### 4. Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)

No, Mindtree does not provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.

#### 5. Details on assessment of value chain partners:

	% Of value chain partners (by value of business done with such partners) that were assessed
Health and safety practices	0%
Working Conditions	0%

6. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.

None

#### PRINCIPLE 4: Businesses should respect the interests of and be responsive to all its stakeholders

#### **Essential Indicators**

#### 1. Describe the processes for identifying key stakeholder groups of the entity.

We are an organization born inclusive in nature and purpose. Since our inception, we have included diverse segments of people in our talent pool, contributed to social causes even in tough business climates, treated suppliers like our partners and our customers with dedicated commitment, all along driven by our inclusive values and principles. They indicate how Mindtree extended its inclusivity to larger stakeholders from the beginning with its insistence on stakeholder identification and engagement.

Sustainability framework brought a formal process to the philosophy already being practiced at Mindtree. Stakeholder consultation on sustainability aspects formed a key part of the exercise. The vast range of stakeholder forums bringing in constant inputs and feedback, we realize, is a great way to link materiality to stakeholder concerns on the one hand and for material goal-setting and strategizing on the other hand.

Mindtree identifies and prioritizes its key stakeholder segments based on their impact on the organization and the organization's impact on them. We have built a vast range of forums to constantly engage with all our stakeholders. The forums collect stakeholder concerns, which in turn act as inputs for our policies, strategies, actions, and materiality assessment.

Our exercise of identification and prioritization of stakeholders has shown us several segments to be constantly engaged with. The wide range of engagement platforms we have designed helps us be in touch with their concerns and expectations in a two-way dialogue. These platforms also work as a source of critical stakeholder feedback for us. Mindtree keeps evolving these platforms periodically, revamping and refining them as per the needs and requirements of the stakeholders and the business.

2. List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.

Stakeholder Group	Whether identified as Vulnerable & Marginalized Group (Yes/No)	Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other	Frequency of engagement (Annually/ Half yearly/ Quarterly/ others – please specify)	Purpose and scope of engagement including key topics and concerns raised during such engagement
Customers	No	Project feedback survey	Quarterly	Business value, Resilience, and innovation regarding pandemic challenges.
Customers	No	Customer experience survey	Annual	Understanding customer's perception at account management and engagement practices administering CES to our customer organizations' CXC and Senior-level contacts
Employees	No	CEO Connect	Quarterly	Direct interaction with senior leaders
Employees	No	All Minds Meet	Annual	A platform to interact with the senior management, ask questions and voice opinions.
Employees	No	Crest Awards	Quarterly	Career development
Employees	No	РАСЕ	Annually	Performance appraisal discussions
Communities	Yes	Social Programs	Periodic	Pandemic relief and Impacts, Beneficiary livelihoods, Interaction with communities & NGOs through Mindtree Foundation
Suppliers	No	Vendor Meets	Quarterly	Long-term partnership
Investors	No	AGM Analyst Meeting Reports	Annual	Stability, Sustained performance (Growth and profitability)
Government and regulators	No	Workshops Industry Events	Annual	Ethical governance and Compliance, Sustainability Disclosures, Job creation.

#### **Leadership Indicators**

# 1. Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.

The Board, through its various committees, foresees the process of consultation between various stakeholders.

At Mindtree, Economic performance is of prime importance, not only for building a sustainable organization but also for cascading the value for its internal and external stakeholders. Client satisfaction is a key measure of our performance and will be the number one priority with the dynamic changes in the business landscape with the need for greater transparency and ethical governance, innovation and technology upgradation, data privacy, and information management as significant value drivers. The Audit Committee of the Board oversees the economic performance and governance matters. It promotes the disclosures of better governance aspects in terms of compliances, ensures the disclosed information is correct, prompt, and transparent. To ensure quality and compliance with applicable environmental, social, and governance standards, the Company also engages closely with the suppliers for audits, training, and knowledge exchange.

Secondly, social responsibility has been ingrained into the very mission of Mindtree since its inception and has evolved to impact society in multiple ways. Our social responsibility manifests itself through Mindtree Foundation-led CSR initiatives and people-led initiatives in volunteering. Having started with a non-strategic approach to CSR, Mindtree has progressed to build rigorous systems, methods, and measurements. The Board-level CSR Committee looks into environmental and social topics. In turn, it is delegated to the management to monitor the activities undertaken with the supervision of the sustainability function.

Thirdly, the stakeholder engagements are also reviewed by the Stakeholders' Relationship Committee (SRC). The Stakeholders' Relationship Committee of the Board has expanded its Terms of Reference (TOR) to include review of various measures and initiatives of People Function, vendors, and other procurement function initiatives and risk mitigation measures taken, in addition to the engagements with investors.

Fourthly, the Risk Management Committee meets every quarter to discuss risks and their mitigation plans, along with key risks that have emerged during the course of the year.

Last but not the least, the Nomination and Remuneration Committee (NRC) also focuses on other people's function matters. The terms of reference of the Nomination and Remuneration Committee (NRC) also cover review of policies of people's best practices among peers.

Ultimately, the Board of Directors review and approve strategic directions and initiatives and take cognizance of issues, forces, and risks that define and drive the Company's long-term performance. The respective Committee Chairperson updates the Board at every meeting on the discussion/ deliberations of the Committees. Further, the Board members actively discuss various ESG initiatives of the Company and encourage the senior management to take steps beyond regulatory requirements.

The Board of Directors have constituted the Board-level CSR Committee, with an Independent Director being the Chairperson of the Committee, which presently consists of four Directors with one Executive Director (COO) and three Independent Directors. In turn, it is delegated to CPO to monitor the activities undertaken with the supervision of the sustainability function. Our Board of Directors know stakeholder concerns, if any, through the Stakeholders' Relationship Committee (SRC) updates. SRC of the Board has expanded its Terms of Reference (TOR) to include a review of people and procurement function.

At Mindtree, the Board is the prominent governance body. The Board has constituted its committees as per the requirements of the Companies Act, 2013 and the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. Independence, tenure, and the responsibilities of the board/committee members are as per the said regulations, and the additional responsibilities may be delegated by the Board from time to time. The CSR Committee consists of two male and two female Directors. On the stakeholders' representation, Company receives suggestions/recommendations of shareholders during AGM/through email on dedicated email id for investors and other stakeholders. The Company implements the same as deemed appropriate. The Chairman of the Board of directors is a Non- Executive Chairman. We believe such separation of Chairman and Managing Director positions is a feature of good governance.

# 2. Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No). If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

We have different engagement platforms where stakeholder consultation is taken into Board, even at the committee level. The respective Committee Chairperson updates the Board at every meeting on the discussion/deliberations of the Committees. Further, the Board members actively discuss various ESG initiatives of the Company and encourage the senior management to take steps beyond regulatory requirements.

We have built a vast range of forums to constantly engage with all our stakeholders. The forums collect stakeholder concerns, which in turn act as inputs for an opportunity to improve our policies, strategies, actions, and materiality assessment.

Stakeholder consultation is used to support the identification and management of environmental topics as follows.

- To receive inputs/suggestions from all the stakeholders, we have interested parties register kept at all facilities where they can register the same.
- All Mindtree minds and partners register their inputs using Genie / Green card.
- With respect to the implementation of legal requirements, PCB authorities are consulted in case of any clarifications are required.
- Consultation with partners is done to understand the feasibility & benefits of the initiatives before implementation at the ground level.

Environment-related issues change are an integral part of our business strategy and Mindtree's Enterprise Risk Management (ERM) framework supports sustainable growth & generating value for its external & internal stakeholders. The ERM team has quarterly discussions with risk owners/ stakeholders with different organizational units such as business, finance, legal, compliance, information security, delivery to track progress on risk treatment measures and identify emerging risks and opportunities.

Stakeholder consultation is leveraged to support the identification of the community needs. Social responsibility is ingrained into the very mission of Mindtree since its inception and has evolved to impact society in multiple ways. Our social responsibility manifests itself through Mindtree Foundation-led CSR initiatives and people-led initiatives in volunteering. We work along with the implementation NGO for assessing the community needs, engage with the stakeholders and jointly design impactful programs.

# 3. Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.

At Mindtree, we hold ourselves accountable to the community that we live in. We believe in making a difference through Giving. It is an essential part of the people-centric culture that we embrace across the organization. With a systematic approach, we aim to make a deep and lasting impact on education, employment, and creating a better world for people with disabilities.

Mindtree Foundation does ground level needs assessment studies which captures concerns and needs of the marginalized segments. Mindtree designs its CSR project interventions based on these needs and concerns. Integrated social solutions area results of such exercises. The NGO partners also provide Mindtree with inputs on vulnerable stakeholder needs and concerns from time to time. Mindtree's recent initiatives for PwDs, with spectrum design approach, is one such instance where unattended needs of the PwD segment in times of the COVID crisis were noticed, heard, and responded to by Mindtree with a holistic approach (spectrum design).

Please refer to our Mindtree Foundation website https://www.mindtreefoundation.org/ for more details.

#### PRINCIPLE 5: Businesses should respect and promote human rights

#### **Essential Indicators**

1. Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:

		FY 2021-22			FY 2020-21			
Category	Total (A)	No. of employees/ workers covered (B)	% (B/A)	Total (C)	No. of employees/ workers covered (D)	% (D/C)		
		En	nployees					
Permanent	35,071	35,071	100%	23,814	23,814	100%		
Other than permanent	5,116	5,116	100%	2,330	2,330	100%		
Total Employees	40,187	40,187	100%	26,144	26,144	100%		

2. Details of minimum wages paid to employees and workers, in the following format:

			FY 2021-2	2			FY 2020-2		1	
Category	Total	Equal to Minimum N Wage		More than Minimum Wage		Total	Equal to Minimum Wage		More than Minimum Wage	
	(A)	No. (B)	% (B/ A)	No. (C)	% (C / A)	(D)	No. (E)	% (E / D)	No. (F)	% (F / D)
Permanent	35,071	Nil	Nil	35,071	100%	23,814	Nil	Nil	23,814	100%
- Male	23,650	Nil	Nil	23,650	100%	16,151	Nil	Nil	16,151	100%
- Female	11,415	Nil	Nil	11,415	100%	7,663	Nil	Nil	7,663	100%
Other than permanent	5,116	Nil	Nil	5,116	100%	2,330	Nil	Nil	2,330	100%
- Male	3,530	Nil	Nil	3,530	100%	1,758	Nil	Nil	1,758	100%
- Female	1,586	Nil	Nil	1,586	100%	572	Nil	Nil	572	100%

### 3. Details of remuneration/salary/wages, in the following format:

		Male		Female
	Number	Median remuneration/ salary/ wages of respective category	Number	Median remuneration/ salary/ wages of respective category
Board of Directors (BoDs)				
a. Executive Directors*	3	₹ 65,548,707	-	-
b. Non-Executive Directors	5	₹ 3,000,000	2	₹ 3,000,000
Key Managerial Personnel	2	₹ 10,551,078	-	-
Employees other than BoD and KMPs	India – 20,979	India – ₹ 1,100,000	India – 10,522	India – ₹ 771,240
	Onsite – 2,668 Total – 23,647	Onsite – \$94,978	Onsite – 890 Total – 11,412	Onsite – \$ 78,000

\*Note: One Executive Director resigned on Jan 3, 2022.

4. Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)

Yes, Mindtree has respective individuals who are responsible for addressing human rights impacts in India & APAC, UK & Europe, and US & Canada.

#### 5. Describe the internal mechanisms in place to redress grievances related to human rights issues.

Mindtree is firmly committed to upholding the values and principles of human rights in all its conduct across all levels. We constantly endeavor to instill these values in our employees and expect them to respect and promote human rights. To maintain this morale and to contribute to creating a great place to work, Mindtree encourages any Mindtree Mind having complaints, concerns of suspected incidents, amongst others, unethical practices, violation of applicable laws and regulations, including the Integrity Code, PIT Code, and Fair Disclosure Code to promptly come forward and express them without any fear of retaliation through Whistleblower Policy.

Additionally, we have an internal committee to deal with the prevention of sexual harassment. POSH Policy aims to drive conformance to the Company's healthy, non-vindictive culture in the form of clearly articulated practices, procedures, and processes in compliance with the applicable laws. If an employee is aware of someone violating Human Rights Policy or law, they are asked to report it immediately to <u>whistleblower@mindtree.com. In</u> addition, we have a grievance procedure in place for the UK region.

#### 6. Number of Complaints on the following made by employees and workers:

		FY 2021-22			FY 2020-21		
	Filed during the year	Pending resolution at th eend of year	Remarks	Filed during the year	Pending resolution at the end of year	Remarks	
Sexual Harassment	4	Nil	Nil	Nil	Nil	Nil	
Discrimination at workplace	Nil	Nil	Nil	Nil	Nil	Nil	
Child Labour	Nil	Nil	Nil	Nil	Nil	Nil	
Forced Labour/Involuntary Labour	Nil	Nil	Nil	Nil	Nil	Nil	
Wages	Nil	Nil	Nil	Nil	Nil	Nil	
Other human rights related issues	Nil	Nil	Nil	Nil	Nil	Nil	

#### 7. Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.

Mindtree has constituted an Internal Committee (IC) to prevent adverse consequences to the complainant in harassment cases. This Committee governs and regulate the behaviour of Mindtree Minds in all matters regarding Harassment. One of the duties of the IC is to issue appropriate interim orders directing the management of Company, on the demand the Complainant or any witness, giving evidence in support, to implement such measures as transfer, changing shifts, etc. so as to protect the Complainant and witness against victimization, discrimination and mental or physical distress.

In cases of Whistleblower and other discriminatory cases, the identity of Respondent, Whistleblower and the witnesses (if any), will be kept confidential to the extent possible given the legitimate needs of law and the requirements of the investigation by the Ethics and Compliance Committee (ECC). Mindtree's culture conforms to a non-vindictive environment. Mindtree ensures every Whistleblower that he/she would not be jeopardized, terminated or retaliated against for reporting any Protected Disclosure under the Whistleblower Policy unless it appears to the reasonable opinion of the Ethics and Compliance Committee that the complaint is materially and unambiguously abusive and/or malicious or false.

Subsequent to the reporting of a Protected Disclosure and appeal, if any Whistleblower perceives that his/her complaint or concern has not been addressed appropriately or is being subject to any victimization by virtue of his/her disclosure, he/she can bring the same to the notice of CEO & MD of Mindtree for investigation and appropriate remedial action.

In addition to the above confidentiality and safety of the complainant paramount in these procedures and hence all information is held by a few core people relevant to the process, like the IC or ECC. Privacy of the complainant is kept intact and no details are divulged either to the People Function representation or the managers/superiors of the complainant.

#### 8. Do human rights requirements form part of your business agreements and contracts? (Yes/No)

Yes, Human rights requirements form a part of our business agreements and supplier contracts. We have adopted Modern Slavery Act and globally compliant in the countries, whereeveer applicable. For suppliers, we expect human rights compliance as they all have to abide by Mindtree's supplier code of conduct. Supplier shall ensure full compliance with all local laws and regulations including but not limited to anti-bribery and anti-corruption, health and safety, human rights, anti-trafficking and modern slavery, data protection, international trade, sanctions, export-controls, anti-trade and competition, prevention of sexual harassment and product safety.

### 9. Assessments for the year:

	% Of your plants and offices that were assessed (by entity or statutory authorities or third parties)
Child labour	0%
Forced/involuntary labour	0%
Sexual harassment	0%
Discrimination at workplace	0%
Wages	0%
Others- please specify	0%

# 10. Provide details of any corrective actions taken or underway to address significant risks/ concerns arising from the assessments at Question 9 above.

None

#### **Leadership Indicators**

#### 1. Details of a business process being modified / introduced as a result of addressing human rights grievances/complaints.

Mindtree has a well-defined governance framework. Our Human Rights Statement provides the broad framework to ensure respectful and dignified treatment of our employees with no tolerance for acts of human rights violations or abuse. We are a UNGC signatory and support the protection and elevation of human rights in accordance with the UN Universal Declaration of Human Rights.

#### 2. Details of the scope and coverage of any Human rights due-diligence conducted.

We have a human rights policy, human rights process, and execution by People Function. We also have a Whistleblower Policy and mechanisms which do address all human rights concerns and bring in due diligence. As Whistleblower does lead to its own actions and implications, we treat Whistleblower under human rights due diligence. On the whole, we have very good tracking mechanisms for monitoring all these issues as they arise and also tracking the resolutions which cover both full time and contractual employees of Mindtree.

# 3. Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

Yes, the premises/ offices of the entity are accessible to differently-abled employees, as per the requirements of the Rights of Persons with Disabilities Act, 2016. Our offices have been designed with a strong emphasis on inclusivity and accessibility, as the office spaces are equipped with wheelchair parking areas, height-adjustable workstations, access ramps at entrances, and specially built washrooms with grab bars for support. We continue improving the infrastructure at all our campuses to enable universal access for persons with disabilities. Mindtree believes in going beyond what is mandated by law. We have a reasonable accommodation policy that enables those with special needs to enjoy the benefits and privileges of employment equal to those enjoyed by similarly situated people without such needs.

#### 4. Details on assessment of value chain partners:

	% Of your value chain partners (by value of business done with such partners) that were assessed
Sexual harassment	0%
Discrimination at workplace	0%
Child Labour	0%
Forced labour/ Involuntary labour	0%
Wages	0%
Others- please specify	0%

### 5. Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.

None

#### PRINCIPLE 6: Businesses should respect and make efforts to protect and restore the environment

#### **Essential Indicators**

#### 1. Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:

Parameter	FY 2021-22	FY 2020-21	
Total electricity consumption (A)	11,572 GJ	13,940 GJ	
Total fuel consumption (B)	1,496 GJ	1,090 GJ	
Energy consumption through other sources (C)	40,474 GJ	41,477 GJ	
Total energy consumption (A+B+C)	53,542 GJ	56,507 GJ	
Energy intensity per rupee of turnover (Total energy consumption/ turnover in rupees)	0.0000005 GJ/rupee	0.0000007 GJ/rupee	
Energy intensity (optional) – the relevant metric may be selected by the entity	0.020 GJ/square feet/annum	0.021 GJ/square feet/annum	

# Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

The metrics in this BRSR are reported according to Global Reporting Initiative Standards based on WRI (World Resource Institute), WBCSD (World Business Council for Sustainable Development) & GHG protocol. The same has been independently assured by thirdparty agency DNV Business Assurance India Pvt Limited (DNV) via limited level of assurance based on international assurance best practices including International Standard on Assurance Engagements 3000 (ISAE 3000) Revised.

# 2. Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N) If yes, disclose whether targets set under the PAT scheme have been achieved. In case targets have not been achieved, provide the remedial action taken, if any.

Not applicable

#### 3. Provide details of the following disclosures related to water, in the following format:

Parameter	FY 2021-22	FY 2020-21
Water withdrawal by source (in kilolitres)		
(i) Surface water	12,370	9,516
(ii) Groundwater	0	0
(iii) Third party water		
- Municipal corporation	15,384	13,716
- Private Suppliers	11,352	12,672
- Packaged Water	412	426
(iv) Seawater / desalinated water	0	0
(v) Others - Rainwater	2,712	2,551
Total volume of water withdrawal (in kilolitres)	42,231	38,881
Total volume of water consumption (in kilolitres)	42,231	38,881
Water intensity per rupee of turnover (Water consumed / turnover)	0.0000004 kl/rupee	0.0000005 kl/rupee
Water intensity (optional) (Water consumed / total built-up area)	0.015 kl/square feet	0.014 kl/square feet

# Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

The metrics in this BRSR are reported according to Global Reporting Initiative Standards based on WRI (World Resource Institute), WBCSD (World Business Council for Sustainable Development) & GHG protocol. The same has been independently assured by thirdparty agency DNV via limited level of assurance based on international assurance best practices including International Standard on Assurance Engagements 3000 (ISAE 3000) Revised.

### 4. Has the entity implemented a mechanism for Zero Liquid Discharge? If yes, provide details of its coverage and implementation.

Yes, all Mindtree offices in India are Zero Liquid Discharge sites with no water discharge let into surface waters, thereby eliminating environmental pollution. All the wastewater which is generated within the premises (both owned and leased) is treated through sewage treatment plants, thus achieving 100% recycling. The treated water is tested to ensure that all parameters comply with the standards as specified by the State Pollution Control Board and used for landscaping, restroom flushing, and for chiller cooling towers.

### 5. Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:

Parameter	Please specify unit	FY 2021-22	FY 2020-21
NOx	kg	45	116
SOx	kg	30	88
Particulate matter (PM)	kg	39	99
Persistent organic pollutants (POP)	-	-	-
Volatile organic compounds (VOC)	-	-	-
Hazardous air pollutants (HAP)	-	-	-
Others- please specify	-	-	-

At Mindtree, we do not record the emission of POP, VOC, HAP, and others

# Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

The metrics in this BRSR are reported according to Global Reporting Initiative Standards based on WRI (World Resource Institute), WBCSD (World Business Council for Sustainable Development) & GHG protocol. The same has been independently assured by thirdparty agency DNV via limited level of assurance based on international assurance best practices including International Standard on Assurance Engagements 3000 (ISAE 3000) Revised.

### 6. Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:

Parameter	Unit	FY 2021- 22	FY 2020-21
Total Scope 1 emissions	Metric tonnes of CO2 equivalent	1,030	1,283
(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)			
Total Scope 2 emissions	Metric tonnes of CO2 equivalent	3,342	3,563
(Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)			
Total Scope 1 and Scope 2 emissions per rupee of turnover	Metric tonnes of CO2 equivalent per rupee of turnover	0.00000004	0.00000006
Total Scope 1 and Scope 2 emission intensity (optional) – the relevant metric may be selected by the entity	Metric tonnes of CO2 equivalent per square feet	0.00160	0.00177

#### Scope 1 Emission Break-up:

Source	2021-22 (ton CO2e)	2020-21 (ton CO2e)
Fuel Usage (Diesel for Fire Engine)	1	304
Fuel Usage (LPG)	8	13
Fugitive Emissions	1,019	958
Owned Vehicles	2	8
TOTAL	1,030	1,283

#### Scope 2 Emission Break-up:

Source	2021-22 (ton CO2e)	2020-21 (ton CO2e)
Electricity/ Energy Purchased	3,342	3,563
TOTAL	3,342	3,563

# Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

The metrics in this BRSR are reported according to Global Reporting Initiative Standards based on WRI (World Resource Institute), WBCSD (World Business Council for Sustainable Development) & GHG protocol. The same has been independently assured by thirdparty agency DNV via limited level of assurance based on international assurance best practices including International Standard on Assurance Engagements 3000 (ISAE 3000) Revised.

#### 7. Does the entity have any project related to reducing Green House Gas emission? If yes, then provide details.

The key initiatives contributing to the reduction in Green House Gas emission are:

- Optimization of UPS led to conserving 2.52 lakhs kWh per annum and cost savings of INR 45.44 lakh per annum with an ROI of 10 months.
- Installation of Variable Frequency Drives (VFD) saved 19,710 units of electricity.
- Replacement of PAC units with inverter technology compressor (PDX PAC units) saved 2.2 lakh units at Global data center, Bengaluru. The same initiative was implemented at CISCO the data center at the Whitefield office saved (projected) 1.8 lakh units.
- Modification of the flushing system at Whitefield Campus reduced the pump operating time by 21% resulting in an energy saving of 5,913 units /annum.
- Optimization of Air conditioning operations for critical rooms saved 63,072 units per annum.
- Replacement of CFL tubes to LED Lights is expected to save 3,701.38 kWh with payback and zero maintenance cost for five years.
- Beyond the preference for clean energy and energy efficiency measures, transport has been a key area for our attempt at reducing emissions. Our Metro Shuttles encourage lower emissions at individual levels.
- · We encourage green commuters by providing cycle stands and charging points.
- The Routematic Application that we use for end-to-end automation of employee transportation creates automated optimum routes based on address data.
- In FY 2021-22, 77.77% of Mindtree's energy requirement has been met by Renewable sources.

#### 8. Provide details related to waste management by the entity, in the following format:

Parameter	FY 2021-22	FY 2020-21
Total Waste generated (in metric tonnes)		
Plastic waste (A)	8.78	5.09
E-waste (B)	42.94	0.67
Bio-medical waste (C)	0.03	0.02
Construction and demolition waste (D)	380	0
Battery waste (E)	43.66	35.66
Radioactive waste (F)	0	0
Other Hazardous waste. Please specify, if any. (G)	3.52	1.51
- Tube Lights	0.23	0.37
- CFL Bulbs	0.09	0.03
- Used Oil:	2.01	0.78
- Oil-soaked cotton waste	0.91	0.02
- DG Filters	0.28	0.16
- Printing Ink/Cartridges	0	0.15
Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e., by materials relevant to the sector)	76.60	76.91
- Inorganic Waste	4.01	3.93
- Organic Waste	44.03	51.81
- Packaging Waste	12.31	5.62
- Others	16.25	15.56
Total (A+B + C + D + E + F + G + H)	555.53	119.86

Parameter	FY 2021-22	FY 2020-21
For each category of waste generated, total wast recovery operations (in metric tonnes)	e recovered through recycling, re-	using or other
Category of waste		
(i) Recycled	171.20	113.39
(ii) Re-used	380.00	0
(iii) Other recovery operations	0	0
Total	551.20	113.39
For each category of waste generated, total waste tonnes)	disposed by nature of disposal me	thod (in metric
Category of waste		
(i) Incineration	1.22	0.197
(ii) Landfilling	3.11	6.26
(iii) Other disposal operations	0	0
Total	4.33	6.45

## Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

The metrics in this BRSR are reported according to Global Reporting Initiative Standards based on WRI (World Resource Institute), WBCSD (World Business Council for Sustainable Development) & GHG protocol. The same has been independently assured by thirdparty agency DNV via limited level of assurance based on international assurance best practices including International Standard on Assurance Engagements 3000 (ISAE 3000) Revised.

# 9. Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products/ services and processes and the practices adopted to manage such wastes.

We are committed to continually improving our Waste management practices at all our facilities. Our waste management philosophy is based on three principles – Reduce, Reuse, and Recycle. All our Indian facilities segregate the waste into around thirty subcategories.

We have adopted various waste management practices like segregation of waste, on-site composting, incineration, and waste reduction at the source, which has led to a decrease in the burden on city landfills. We have avoided single-use food and drink containers and utensils in the cafeteria, meeting rooms, and utmost monitoring is done to minimize the generation of waste.

The pandemic has resulted in additional volumes of biomedical waste, including PPE kits, tissues, surgical masks, and more. We have made sure the separation and handling of these are in accordance with Indian Biomedical Waste Rules.

All the hazardous waste (Used oil, oil-soaked cotton, and DG filters) generated are disposed to SPCB authorized vendors for safe disposal. To increase fuel efficiency, DG maintenance, is done on a regular basis to ensure the effective usage of the fuel. The reduction of fuel usage completely depends on the availability of grid power. Agreement in place to ensure all the toners and cartridges are taken back by the partner for reuse. Only EPA-certified chemicals are used for cleaning and sanitizing activities.

The organic waste generated within our campus is food waste, garden waste, and STP sludge. All the organic waste is treated in an in-house organic waste composter and converted into manure. Sludge generated from STP is dried and blended with this compost. The manure is being used as fertilizer for landscaping within the campus. We also distribute the extra manure to the Mindtree minds during World Environmental Day and Earth Day.

The inorganic waste consists of all other types of waste like paper, plastic, metal, etc., segregated at the source and are disposed of through authorized recyclers. Metal scrap was reused by the in-house team to fix handrails for ladders to access overhead tanks, resulting in a saving of INR 9.2 lakh. Generated construction waste is disposed to the vendor and reused for the construction of roads. Packing waste like cardboard is reused for couriering the laptops to employees working remotely. Implemented WOW' (Well-being Out of Waste) initiative - a program where the recyclable waste is scientifically disposed of and sent for recycling.

In the fiscal year 2021-22, we have recycled 99.17% of the waste generated within our office premises.

# 10. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details:

Not Applicable

11. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:

Not Applicable

12. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N). If not, provide details of all such non-compliances, in the following format:

Mindtree is compliant with the applicable environmental law/regulations.

S. No.	Specify the law/ regulation/ guidelines which was not complied with	Provide details of the non- compliance	Any fines/ penalties/ action taken by regulatory agencies such as pollution control boards or by courts	Corrective action taken, if any
	NA	NA	NA	NA

#### **Leadership Indicators**

1. Provide break-up of the total energy consumed (in Joules or multiples) from renewable and non-renewable sources, in the following format:

Parameter	FY 2021-22	FY 2020-21	
From renewable sources	-		
Total electricity consumption (A)	40,474 GJ	41,477 GJ	
Total fuel consumption (B)	0	0	
Energy consumption through other sources (C)	0	0	
Total energy consumed from renewable sources (A+B+C)	40,474 GJ	41,477 GJ	
From non-renewable sources			
Total electricity consumption (D)	11,572 GJ	13,940 GJ	
Total fuel consumption (E)	1,496 GJ	1,090 GJ	
Energy consumption through other sources (F)	0	0	
Total energy consumed from non-renewable sources (D+E+F)	13,068 GJ	15,030 GJ	

# Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

The metrics in this BRSR are reported according to Global Reporting Initiative Standards based on WRI (World Resource Institute), WBCSD (World Business Council for Sustainable Development) & GHG protocol. The same has been independently assured by thirdparty agency DNV via limited level of assurance based on international assurance best practices including International Standard on Assurance Engagements 3000 (ISAE 3000) Revised.

#### 2. Provide the following details related to water discharged:

Parameter	FY 2021-22	FY 2020-21
Water discharge by destination and level of treatment (in k		
(i) To Surface water		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(ii) To Groundwater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iii) To Seawater		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
(iv) Sent to third-parties		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0

(v) Others		
- No treatment	0	0
- With treatment – please specify level of treatment	0	0
Total water discharged (in kilolitres)	0	0

# Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

The metrics in this BRSR are reported according to Global Reporting Initiative Standards based on WRI (World Resource Institute), WBCSD (World Business Council for Sustainable Development) & GHG protocol. The same has been independently assured by thirdparty agency DNV via limited level of assurance based on international assurance best practices including International Standard on Assurance Engagements 3000 (ISAE 3000) Revised.

### 3. Water withdrawal, consumption and discharge in areas of water stress (in kilolitres):

For each facility / plant located in areas of water stress, provide the following information:

- (i) Name of the area: Pan India locations (Bengaluru, Chennai, Pune, Hyderabad, and Bhuvaneswar)
- (ii) Nature of operations: IT Consulting and Services
- (iii) Water withdrawal, consumption and discharge: India is placed amongst the world's 'extremely water-stressed' countries, according to the Aqueduct Water Risk Atlas released by the World Resources Institute (WRI). We have already depicted our pan India water disclosure details in Q3 Essential indicators under this principle 6 and Q2 Leadership indicators under the principle 6.

# Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

The metrics in this BRSR are reported according to Global Reporting Initiative Standards based on WRI (World Resource Institute), WBCSD (World Business Council for Sustainable Development) & GHG protocol. The same has been independently assured by thirdparty agency DNV via limited level of assurance based on international assurance best practices including International Standard on Assurance Engagements 3000 (ISAE 3000) Revised.

### 4. Please provide details of total Scope 3 emissions & its intensity, in the following format

Parameter	Unit	FY 2021-22	FY 2020-21
Total Scope 3 emissions (Break-up of the GHG into CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)	Metric tonnes of CO2 equivalent	6,404	5,612
Total Scope 3 emissions per rupee of turnover	Metric tonnes of CO2 equivalent per rupee of turnover	0.0000001	0.0000007
Total Scope 3 emission intensity (optional) – the relevant metric may be selected by the entity	Metric tonnes of CO2 equivalent per square feet	0.00234	0.00205

#### Scope 3 Emission Break-up:

Category	2021-22 (ton CO2e)	2020-21 (ton CO2e)	
Employee Commute	4,132	4,230	
Business Travel	2,110	1,343	
Waste	49	30	
Fuel Usage (Diesel for Other Purposes)	4	0	
Freight	109	9	
TOTAL	6,404	5,612	

# Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N) If yes, name of the external agency.

The metrics in this BRSR are reported according to Global Reporting Initiative Standards based on WRI (World Resource Institute), WBCSD (World Business Council for Sustainable Development) & GHG protocol. The same has been independently assured by thirdparty agency DNV via limited level of assurance based on international assurance best practices including International Standard on Assurance Engagements 3000 (ISAE 3000) Revised. 5. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.

Not Applicable

6. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:

S. No	Initiative undertaken	Details of the initiative (Web-link, if any, may be provided along-with summary)	Outcome of the initiative
1	Energy Conservation Programs	<ul> <li>Optimization of UPS</li> <li>Installation of Variable Frequency Drives (VFD)</li> <li>Replacement of PAC units</li> <li>Modification of flushing system</li> <li>Optimization of Air conditioning operations for critical rooms</li> <li>Replacement of CFL tubes to LED Lights</li> </ul>	<ul> <li>744,396.4 kWh projected savings per annum</li> </ul>
2	Water Conservation	<ul> <li>Replacement of existing aerators with efficient aerators</li> <li>Rainwater harvesting and rainwater earth charging</li> </ul>	<ul> <li>1,388 KL / annum savings (Projected)</li> <li>Ensures recharge of the groundwater level and helped us to reduce private water purchase by 123,70KL in this financial year.</li> </ul>
3	Waste Management	Combination of waste reduction, waste segregation, recycling, on-site composting, and incineration	Reduced the burden on the city landfills
		Reuse of metal waste to construct handrail for ladders	This initiative resulted in saving of INR 9.2     lakh
		<ul> <li>Debris waste was disposed to identified partner where in it was used for construction of roads.</li> <li>Replantation of trees within our campus without cutting down to lay pathway.</li> </ul>	Reduction of waste to landfills.

#### 7. Does the entity have a business continuity and disaster management plan? Give details in 100 words/ web link.

Yes, Mindtree has a Business Continuity Management (BCM) program and a Disaster Recovery Plan (DRP). Mindtree's BCM program is based on industry best practices and is certified to ISO22301. In this context, Mindtree conducts regular risk assessments, Business Impact Analysis (BIA) to arrive at recovery parameters. The BCM program is regularly tested and audited as part of Mindtree's ISO27001 and ISO22301 certifications. The following are the three critical components of Mindtree's business continuity framework.

- Preventive framework: This includes risk assessment, business impact analysis, business continuity strategies, implementation of business continuity, testing, monitoring, and reporting.
- Reactive framework: It includes crisis communication (customer, employees, and other stakeholders), emergency response, and coordination with local authorities.
- Curative framework: Curative framework includes disaster recovery and business continuity, including data recovery and return to Business as Usual.

We also have a detailed Disaster Recovery Plan (DRP) to manage infrastructure outages. Critical corporate infrastructure has been moved to the cloud to provide additional resilience. From a financial perspective, we undertake appropriate insurance cover for hazards. For details, refer Risk management section in our annual report.

Business Continuity during pandemic also features in our framework—which has received much attention in the ongoing COVID crisis (<u>https://www.mindtree.com/insights/resources/handling-covid-19-smile-our-faces</u>).

8. Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard?

Mindtree has a responsibility to ensure that all our inputs are being sourced sustainably. We prioritize having a sustainable value chain that leads to a positive global impact. The generation of electronic waste is the only adverse impact that arises from our value chain. We take the necessary actions to insist our suppliers in minimizing e-waste. We have global norms for vendors and are insisting on authorized vendors.

9. Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.

0%

PRINCIPLE 7: Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent

#### **Essential Indicators**

1. a. Number of affiliations with trade and industry chambers/ associations.

Four

b. List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.

S. No	Name of the trade and industry chambers/ associations	Reach of trade and industry chambers/ associations (State/National)
1	National Association of Software and Services Companies (NASSCOM)	National
2	The Associated Chambers of Commerce and Industry of India (ASSOCHAM)	National
3	Confederation of Indian Industry (CII)	National/Regional/ State
4	Bangalore Chamber of Commerce and Industry (BCIC)	State

2. Provide details of corrective action taken or underway on any issues related to anti- competitive conduct by the entity, based on adverse orders from regulatory authorities

Not Applicable

#### Leadership Indicators

### 1. Details of public policy positions advocated by the entity:

S. No.			available in public	Frequency of Review by Board (Annually/ Half yearly/ Quarterly / Others – please specify)	Web Link, if available
1	Carbon Neutrality	Media Interaction	Yes	Others	NA

Mindtree believes in the public good, and rightly so, as part of its responsible socio-economic behavior that is carried forward towards various platforms, advocacy channels, and forums by lending the Company's ideas, visions, expertise, and thought leadership. Mindtree has aligned itself with relevant organizations which work in the larger business/social/environmental and community interests. In addition, the Company also creates and owns innovative pieces of work and solutions. We believe that it is our responsibility to help build a better business environment and thus a better world with opportunities for everyone. Mindtree advocated through Industry forums and networks in India. We work on a range of issues related to sustainability and community aspects- including energy, water, green buildings, biodiversity, waste management, among others. We also support flexibility in the movement of labor.

#### PRINCIPLE 8: Businesses should promote inclusive growth and equitable development

#### **Essential Indicators**

1. Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.

Name and brief details of project	SIA Notification No.	Date of notification	Whether conducted by independent external agency (Yes / No)	Results communicated in public domain (Yes / No)	Relevant Web link
Through BRDO, Goonj, Centurion, Agastya, Sikshana, AMBA & CURE India partners, benefited the differently abled, provided alternate livelihood opportunities, promoted education, & created awareness about menstrual hygiene to tribal women	Certificate No: SIA 1001	30 March 2022	Yes, Social Audit Network – SAN INDIA	Yes	https://www.mindtree. com/sites/default/ files/2022-04/ SocialImpactAssessment_ FY2021-22.pdf

2. Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:

S. No.	Name of Project for which R&R is ongoing	State			covered by R&R	Amounts paid to PAFs in the FY (In INR)
	NA	NA	NA	NA	NA	NA

#### 3. Describe the mechanisms to receive and redress grievances of the community.

Community grievances are addressed by the project execution team appointed by the NGO partner working on the ground. They are in direct connect with the beneficiaries who share their concerns with them. During our periodic virtual connects with the project execution team as well as during our periodic project site visits, we evaluate and understand the grievances for further course of action. Based on their grievances, we take corrective action where required in consultation with our NGO partners.

#### 4. Percentage of input material (inputs to total inputs by value) sourced from suppliers:

	FY 2021-22	FY 2020-21
Directly sourced from MSMEs/ small producers		
- Goods	19.32%	20.47%
- Services	80.68%	79.53%
Sourced directly within the district and neighbouring districts		
- Goods	11.48%	14.94%
- Services	36.68%	31.91%

Note: Data presented in the table above pertains only to India because MSMEs and districts are confined to the country.

#### Leadership Indicators

1. Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):

Details of negative social impact identified	Corrective action taken
NA	NA

2. Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:



3. (a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)

Mindtree prefers to purchase from suppliers comprising marginalized/vulnerable groups though we do not explicitly have a policy on Preferential Procurement.

#### (b) From which marginalized /vulnerable groups do you procure?

Mindtree procures from marginalized and vulnerable groups such as women owned businesses and enterprises. In addition, we also procure goods and services from MSMEs and from neighboring districts.

#### (c) What percentage of total procurement (by value) does it constitute?

Total procurement spent towards women owned businesses, MSME, small producers constitute to 11.17%

4. Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:

Not applicable

5. Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.

Not Applicable

#### 6. Details of beneficiaries of CSR Projects:

S. No.	CSR Project	No. of persons benefitted from CSR Projects	% Of beneficiaries from vulnerable and marginalized groups Not applicable	
1	CURE India   Clubfoot treatment for new-born Children	400		
2	SPASTN   Reaching inclusive education and comprehensive rehabilitation to the doorstep	62	Not applicable	
3	APD   Reaching inclusive education and comprehensive rehabilitation to the doorstep	d comprehensive 178		
4	AMBA   Job-Oriented Training of Intellectually Disabled Youths       200         for Employment       200		Not applicable	
5	Sparsh Foundation   Early Corrective Surgeries	29	Not applicable	
6	Centurion University   Skill Development training for hearing and speech impaired youths	60	Not applicable	
7	Goonj   Medical Support for Missed-Out Communities (Leprosy, Trans-genders, HIV patients etc.)	2,000	Not applicable	
8	IDL   Education Continuity Support for Visually Impaired Children	50	Not applicable	
9	BMST   Thalassemia disabled people – blood transfusions support	people – blood transfusions 50		
10	Bal Bhavan   Disabled Friendly Park	*	Not applicable	
11	Mindtree - NCPEDP Helen Keller Awards	15	Not applicable	
12	SSK   Literacy Enhancement	280	Not applicable	
13	Gubbachi   Transform Foundational Learning	90	Not applicable	
14	Dream to Reality (D2R)	22	Not applicable	
15	Agastya   Home Lab Kit	8,000	Not applicable	
16	Sikshana Foundation   Sikshana @ Home	141,966	Not applicable	

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S. No.	CSR Project	No. of persons benefitted from CSR Projects	% Of beneficiaries from vulnerable and marginalized groups	
17	BRDO   Yuva Jyoti	957	Not applicable	
18	Goonj   Not Just Piece of Cloth (NJPC)	2,500	Not applicable	
19	Mindtree - OxyBus	107	Not applicable	
20	SankalpTaru   MyTree Mindtree	5,000	Not applicable	
21	Olympics Gold Quest   Paralympics Support	10	Not applicable	
22	National Agro Foundation   Integrated Watershed Community Development Program (IWCDP)	2,001	Not applicable	

\*Number of disabled children benefiting from using the park would be disclosed after Bal Bhavan is made open to public.

#### PRINCIPLE 9: Businesses should engage with and provide value to their consumers in a responsible manner

#### **Essential Indicators**

#### 1. Describe the mechanisms in place to receive and respond to consumer complaints and feedback.

Various Feedback Mechanism have been provided below:

- Steering committee meetings / Quarterly Business Review
- Customer visits
- Mindtree website
- Senior management interactions
- Project status review meetings
- Customer touchpoints
- Customer Experience Survey
- Project Feedback Survey

The touchpoint feature in Delivery Platform (Homegrown tool to capture the Project Management activities) is a placeholder to capture customer interactions (Appreciation, Escalation, Feedback, Review, SCM) with delivery teams. We have various governance meetings that are held at every level of projects/accounts/senior management levels.

To ensure completeness in understanding customers' experience of our services, Mindtree has two levels of feedback surveys – Customer Experience Survey (CES) and Project Feedback Survey (PFS). The annual Customer Experience Survey (CES) aims at understanding customers' perception of account management and engagement practices by administering CES to our customer organizations' CXO and Senior- level contacts. This survey is administered by a market research firm to bring independence and objectivity.

The quarterly Project Feedback Survey (PFS) conducted by Mindtree aims at understanding customers' satisfaction with Mindtree project execution and delivery practices. We administer PFS to our customer organizations' Mid-Level contacts who have day-to-day interaction with our project teams.

#### 2. Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:

	As a percentage to total turnover
Environmental and social parameters relevant to the product/ services	NA
Safe and responsible usage	NA
Recycling and/or safe disposal	NA

Not applicable, as Mindtree is engaged in B2B model and does not directly engage with Consumers.

### 3. Number of consumer complaints in respect of the following:

	FY 20	FY 2021-22		FY 20	020-21	
	Received during the year	Pending resolution at end of year	Remarks	Received during the year	Pending resolution at end of year	Remarks
Data privacy	Nil	Nil	Nil	Nil	Nil	Nil
Advertising	Nil	Nil	Nil	Nil	Nil	Nil
Cyber-security	Nil	Nil	Nil	Nil	Nil	Nil
Delivery of essential Services	Nil	Nil	Nil	Nil	Nil	Nil
Restrictive Trade Practices	Nil	Nil	Nil	Nil	Nil	Nil
Unfair Trade Practices	Nil	Nil	Nil	Nil	Nil	Nil
Other	Nil	Nil	Nil	Nil	Nil	Nil

### 4. Details of instances of product/ service recalls on account of safety issues:

Not Applicable

### 5. Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No) If available, provide a weblink of the policy.

Yes, Mindtree has a policy on cybersecurity and risks related to data privacy.

Mindtree's cyber security policy is published internally for all Mindtree Minds. Mindtree is committed to managing and improving the security of all critical information assets through the deployment of adequate protection measures and user training. The Company has implemented controls to secure IT infrastructure, including intrusion prevention systems, firewalls, anti-malware software, content filtering gateways, data encryption, data leakage protection systems, and 24/7 monitoring. Endpoint security controls have been deployed to ensure that levels of security are similar, be it in the corporate environment or while working remotely. Periodic internal and external audits provide oversight about the cyber security risk. The information security program is reviewed regularly by the Risk Management Committee of the Board.

Mindtree has put together both a Privacy framework and a Privacy policy. The Privacy policy is published on the Mindtree website and can be accessed via: <u>https://www.mindtree.com/privacy-policy</u>. The Privacy Policy is designed to explain and set out Mindtree's procedures and policies when processing Personal Data and Sensitive Personal Data across its organization. This Policy defines the requirements to ensure compliance with the Data Privacy Laws applicable to Mindtree's collection, use, and transmission of Personal Data and Sensitive Personal Data. Mindtree's Data Loss Prevention Policy (DLP) is published internally.

# 6. Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product/service recalls; penalty / action taken by regulatory authorities on safety of products/services.

None

#### **Leadership Indicators**

#### 1. Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).

Mindtree is a global technology solutions and consulting Company. The information about the industry served and services offered is provided in detail on the website of the Company <u>www.mindtree.com</u>.

#### 2. Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.

Not applicable, as the Company is not engaged in B2C model.

#### 3. Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.

The exchange of information within the Organization and with interested parties is an important component of Mindtree's Business Continuity Management System. The need for internal and external communications with respect to BCMS has been determined, including details of what to communicate with whom and when to communicate. To this effect, a well-defined Communication Procedure has been defined. The procedure specifies processes for communicating internally within the Organization and communicating externally with customers, partners, local community, media, and other relevant interested parties. The process for receiving, documenting, and responding to communication from interested parties has also been mentioned. Facilitation of structured communication with relevant authorities (emergency responders) has also been covered in the procedure.

# 4. Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not Applicable) If yes, provide details in brief.

Not applicable since Mindtree is a global technology solutions and consulting company.

# Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)

Yes, Mindtree carries out surveys with regard to customer satisfaction. To ensure completeness in understanding customers' experience of our services, Mindtree has two levels of feedback surveys – Customer Experience Survey (CES) and Project Feedback Survey (PFS).

Our customer satisfaction surveys indicate a high relationship score with our largest customer. In addition, a high level of executive connect is maintained. We are strengthening the connect with the next set of top customers to achieve broad-based growth. We have governance mechanisms in place to track deliverables, and customer feedback is rigorously monitored. Customer satisfaction scores are a testimony to our focus on customers and quality delivery.

The high outcomes, denote relationships that have become stronger and deeper in the years of the pandemic, thanks to our initiatives across people management and operational and delivery excellence. The results across all facets of the survey, which recorded the highest ever score across both response and rating, are clear evidence of the dedicated efforts of our teams and our disciplined execution. This was possible because:

- Our top brass were active sponsors for key accounts.
- Not a single delivery was missed during the year of the pandemic.
- We attained our goals of profitable growth through customer stickiness, which is a result of our commitment to customer satisfaction.

#### 5. Provide the following information relating to data breaches:

a. Number of instances of data breaches along-with impact

Nil

b. Percentage of data breaches involving personally identifiable information of customers

0%