

UK Modern Slavery Statement FY: 22-23

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1 LTIMINDTREE'S MODERN SLAVERY STATEMENT

This annual statement is published in accordance with Modern Slavery Act 2015, UK (Act) for Financial Year 2022-2023 and sets out the actions we have taken to assess and address modern slavery and human trafficking risks in our operations and supply chains.

This statement is made on behalf of LTIMindtree Limited, on behalf of its subsidiary LTIMindtree UK Limited having registration number 12817556, and a subsidiary Syncordis Limited having registration number 10045506, and its branch operations in United Kingdom having registration number FC020383 (collectively referred to as LTIMindtree or Company for the purpose of this Statement).

2 OUR ORGANISATION, OPERATIONS, AND SUPPLY CHAIN

2.1 Company overview and Operations

LTIMindtree is a global technology consulting and digital solutions company that enables enterprises across industries to reimagine business models, accelerate innovation, and maximize growth by harnessing digital technologies. As a digital transformation partner to more than 700 clients, LTIMindtree brings extensive domain and technology expertise to help drive superior competitive differentiation, customer experiences, and business outcomes in a converging world. Powered by more than 84,000 talented and entrepreneurial professionals across more than 30 countries, LTIMindtree, a Larsen & Toubro Group company combines the industry acclaimed strengths of erstwhile Larsen and Toubro Infotech and Mindtree in solving the most complex business challenges and delivering transformation at scale. Our annual report for FY 22-23 can be accessed at <https://www.ltimindtree.com/wp-content/uploads/2023/06/Integrated-Annual-Report-2022-23.pdf?pdf=download>.

2.2 Our Supply Chain

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

3 OUR BUSINESS

As a socially and environmentally responsible business, we are focused on sustainable growth and building long-term stakeholder value. Our sustainability framework is based on a diverse workforce, an inclusive workspace, employee engagement, robust policies, strict adherence to code of conduct, a strong risk management and compliance framework, reporting and disclosure. The Sustainability report of LTIMindtree for financial year 2022-23 can be accessed at our website <https://www.ltimindtree.com/social-responsibility/>.

4 OUR POLICIES IN RELATION TO MODERN SLAVERY AND HUMAN TRAFFICKING

4.1 Systems & Practices

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

4.2 Complaint Mechanism

We have systems to encourage the reporting of concerns and protection of whistleblowers. All our employees including sub-contracted employees have access to complaint mechanism, where they can lodge complaints on various concerns not limited to use of child labour, modern slavery, forced, bonded, or indentured labour or involuntary prison labour, human trafficking etc. Our whistleblower policy can be accessed at <https://www.ltimindtree.com/wp-content/uploads/2023/02/Whistle-Blower-Policy.pdf?pdf=download>.

4.3 Periodic Review

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

5 DUE DILIGENCE, RISK ASSESSMENT AND RISK MITIGATION PROCESSES FOR MODERN SLAVERY & HUMAN TRAFFICKING

5.1 Due Diligence process

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

5.2 Risk Mitigation process

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

Internal controls in place



5.3 Risk assessment

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

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

A. Sector & industry risk assessment

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

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

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

Low risk - talent acquisition (manpower service providers)

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

B. Goods & services category risk assessment

We have carried out risk assessment for the goods and services and identified modern slavery risk of low and moderate on few areas like building infrastructure and maintenance, security services, hospitality etc. The above risk arises from third party outsourcing.

C. Geographic risk assessment

Based on our modern slavery risk assessment, we have identified suppliers who are present in countries vulnerable to modern slavery risk, but none of the suppliers are from manual labour-intensive sectors having high modern slavery related risk. We will continue to identify by way of ongoing periodic assessments, any modern slavery risks that may be present anywhere in our global and domestic operations and supply chains of the reporting entity and subsidiaries.

The overall risk assessment for the above categories is low for FY 2022-23.



6 TRAINING AND AWARENESS

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

7 MEASURING EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

7.1 Supplier Engagement Program

This program integrates a continuing evaluation, capacity building and risk management with a focus on human rights, labour practices and regulatory compliance. Our supply chain is integrally linked to its successful growth, supported by supplier onboarding process which covers modern slavery risks. Our supplier code of conduct can be accessed at <https://www.ltimindtree.com/wp-content/uploads/2022/12/LTIMindtree-Supplier-Code-Of-Conduct.pdf?pdf=download>. We expect that the above steps will ensure responsible behaviour from our suppliers.

7.2 Prevention of slavery and human trafficking

As per the key performance indicators of our whistleblower mechanism, we did not have any complaints relating to slavery and human trafficking in our company and subsidiaries during the FY 2022-23. We use oversight measures like periodic audits, labour monitoring and payroll

systems and adverse media screening & due diligence tool for all active suppliers to ensure that slavery and human trafficking are not taking place in any part of our business or supply chains.

8 REMEDIES FOR BREACH

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

9 FURTHER STEPS

9.1 As part of training and awareness about modern slavery, we will include modern slavery section in our mandatory e-Learning module which will cover all employees including sub-contracted employees.

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

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

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

10 DECLARATIONS

This statement has been prepared by our Company pursuant to section 54(1) of the Act in respect of the financial year 2022-2023. It sets the new and ongoing steps we are taking to address and prevent modern slavery taking place, both within our business and our supply chain. The Statement has been approved by the Board of Directors of our Company on, July 17, 2023.

Debashis Chatterjee
CEO & Managing Director
LTIMindtree Limited
Date: 28-August-2023

LTIMindtree [NSE: LTIMindtree] is a global technology consulting and digital solutions company that enables enterprises across industries to reimagine business models, accelerate innovation, and maximize growth by harnessing digital technologies. As a digital transformation partner to more than 700 clients, LTIMindtree brings extensive domain and technology expertise to help drive superior competitive differentiation, customer experiences, and business outcomes in a converging world. Powered by more than 84,000 talented and entrepreneurial professionals across 30 countries, LTIMindtree — a Larsen & Toubro Group company — combines the industry-acclaimed strengths of erstwhile L&T Infotech and Mindtree in solving the most complex business challenges and delivering transformation at scale. For more, please visit www.ltimindtree.com or @LTIMindtree.