

## Business Responsibility Report

Mindtree was founded as an IT solutions company, with a mission to make businesses and societies flourish. Social wellbeing is an innate part of our vision, and apparent in our business and social impacts. We endorse universally declared principles and guidelines in responsible business, and share our emissions performance through CDP report annually and our sustainability performance through GRI-based sustainability reports every year. We are a UNGC signatory, and our sustainability report maps to UNGC and NVG principles.

Our sustainability framework focuses on governance and advocacy, workplace sustainability and ecological sustainability, while our CSR board level committee and our CSR Charter guide our nonstrategic social contributions routed through our Mindtree Foundation and our technology-enabled social transformation platforms.

Our governance and advocacy is based on a set of key policies that set the tone for the ethics and values we pursue, and we take leadership positions in public forums to advocate responsible business practices. Our approach and mechanisms in this area are well detailed in the 'Governance report' section of this annual report.

Workplace sustainability is of high significance to our knowledge-driven sector. A set of relevant policies that drive best practices and our diversity charter (EDGES: Ethnicity, Disability, Gender, Sexual orientation), coupled with best-in-class management systems (OHSAS) and our home-grown systems and engagement platforms keep our workplace thriving. Cutting-edge learning environment right from the entry level (Mindtree Kalinga), state-of the art learning platforms (newly launched Yorbit, with its 1,013 online courses being used by 76.44% of Mindtree Minds), and constantly evolving leadership development programs keep Mindtree Minds focused on expertise-led work in a collaborative environment dedicated to excellence.

Two of our board members are women. Our entry level enrollment of women touched 49% in the year 2016-17. We launched an exclusive leadership development program for mid-rung women talent last year. Our diversity focus is going to get deeper and more nuanced in the years to come. (For a detailed account of our approach and accomplishments, please refer to our sustainability report published on our website.)

Also, 51.2% of beneficiaries of Mindtree Foundations' CSR programs in India are women. Ecological sustainability is crucial for us as resource conservation is a precautionary principle we endorse, and also because it makes smart business sense.

The various systems and mechanisms we have set in place for energy efficiency, emission reduction, water efficiency and waste management enable us to achieve our internal targets for resource conservation. Clean energy is a commitment for us, and we are taking steps to ensure that renewable energy forms at least 20% of our energy composition in the medium term. (For a detailed account of our ecological performance, please refer to Annexure 7 of the Directors' report in this Annual report and our sustainability report available on our website.)

Social inclusion is a theme central to Mindtree's vision, and Mindtree Foundation continues its deep and integrated work in the areas we have chosen to focus on. With the support of our NGO partners, the Mindtree Foundation's leadership team engages directly at the grass-root level, assessing need gaps, designing integrated solutions, and monitoring to render them sustainable. (The project details are available in Annexure of our Directors' report in this annual report and the detailed approach in our sustainability report.). Impacts achieved by our 'I Got' suite of technology platforms (as described in Annexure 7 of the Directors' report) validate our conviction in leveraging technology to increase the reach of our sustainability solutions for the larger good, which goes beyond the boundaries of our business.

The following sections pertain to information as per the template suggested by SEBI.

### SECTION A: General Information About The Company

1. Corporate Identity Number (CIN) of the Company: L72200KA1999PLC025564
2. Name of the Company: Mindtree Limited
3. Registered address: Global Village, RVCE Post, Mysore Road, Bengaluru-560 059, Karnataka, India
4. Website: [www.mindtree.com](http://www.mindtree.com)
5. E-mail id: [investors@mindtree.com](mailto:investors@mindtree.com)
6. Financial Year reported: 01 April, 2016 -31 March, 2017
7. Sector(s) that the Company is engaged in (industrial activity code-wise): Information Technology Sector
8. List three key products/services that the Company manufactures/provides (as in balance sheet) Digital: Cloud, Data Analytics. The other services include Application Development & Maintenance, Infrastructure Management, EAI, R&D, Testing, Consulting, Salesforce and SAP.
9. Total number of locations where business activity is undertaken by the Company
  - (a) Number of International Locations: 17 (Details in "Global Presence" section in this report.)
  - (b) Number of National Locations: 5
10. Markets served by the Company – Local/State/National/International: America, Asia Pacific, Europe, India (Refer to "Global Presence" section in this report.)

**SECTION B: Financial Details Of The Company**

1. Paid up Capital (₹): 1,680,255,460
2. Total Turnover (₹): 48,159 Mn.
3. Total profit after taxes (₹): 4,891 Mn.
4. Total Spending on Corporate Social Responsibility (CSR) as percentage of profit after tax (%):  
As disclosed in the Directors' report- Annexure 7.
5. List of activities in which expenditure in 4 above has been incurred:  
As disclosed in the Directors' report- Annexure 7- detailed table.

**SECTION C: Other Details**

1. Does the Company have any Subsidiary Company/ Companies?  
The company has 5 subsidiaries as shared in the "Global Presence" section of this report.
2. Do the Subsidiary Company/Companies participate in the BR Initiatives of the parent company? If yes, then indicate the number of such subsidiary company(s)  
The subsidiaries are subject to our principles and policies in ethics and responsibility and share several features of our best practices in workplace sustainability. Our CSR and environmental investments are, however, focused in our India operations.
3. Do any other entity/entities (e.g. suppliers, distributors etc.) that the Company does business with, participate in the BR initiatives of the Company? If yes, then indicate the percentage of such entity/entities? [Less than 30%, 30-60%, More than 60%]

Our suppliers and distributors are yet to participate in our BR activities.

**SECTION D: Br Information**

1. Details of Director/Directors responsible for BR
  - (a) Details of the Director/Director responsible for implementation of the BR policy/policies
    1. DIN Number: 00146954
    2. Name: N.S. Parthasarathy
    3. Designation : Executive Vice Chairman, President and COO

(b) Details of the BR head

No.	Particulars	Details
1	DIN Number (if applicable)	00146954
2	Name	N. S. Parthasarathy
3	Designation	Executive Vice Chairman, President and COO
4	Telephone number	080-67064000
5	e-mail id	Parthasarathy.NS@mindtree.com

2. Principle-wise (as per NVGs) BR Policy/policies

(a) Details of compliance (Reply in Y/N)

No.	Questions	P	P	P	P	P	P	P	P	
		1	2	3	4	5	6	7	8	9
1	Do you have a policy/ policies for...	Y	Y	Y	Y	Y	Y	N	Y	Y
2	Has the policy being formulated in consultation with the relevant stakeholders?	Y	Y	Y	Y	Y	Y		Y	Y
3	Does the policy conform to any national / international standards? If yes, specify? (50 words) *	Y	Y	Y	Y	Y	Y		Y	Y
4	Has the policy being approved by the Board? Is yes, has it been signed by MD/ owner/ CEO/ appropriate Board Director?	Y	Y	Y	Y	Y	Y		Y	Y
5	Does the company have a specified committee of the Board/ Director/ Official to oversee the implementation of the policy?	Y	Y	Y	Y	Y	Y		Y	Y
6	Indicate the link for the policy to be viewed online?	Links are provided below this table								
7	Has the policy been formally communicated to all relevant internal and external stakeholders?	Y	Y	Y	Y	Y	Y		Y	Y
8	Does the company have in-house structure to implement the policy/ policies?	Y	Y	Y	Y	Y	Y		Y	Y
9	Does the Company have a grievance redressal mechanism related to the policy/ policies to address stakeholders' grievances related to the policy/ policies?	Y	Y	Y	Y	Y	Y		Y	Y
10	Has the company carried out independent audit/ evaluation of the working of this policy by an internal or external agency?	Y	Y	Y	Y	Y	Y		N	Y

\* Our Sustainability Policy is inspired by GRI framework and our EHS policy by management systems and standards such as ISO 14001 and OHSAS). Our Whistleblower policy and CSR policy conform to Companies Act 2013, and Anti-slavery & anti human trafficking policy conforms to UK norms. Policies such as Equal opportunity, Reasonable accommodation and Code of conduct are internally originated policies guided by ILO principles/framework.

**Website links to our policies:**

- P1: <http://www.mindtree.com/sites/default/files/mindtree-whistle-blower-policy-1st-april-2016.pdf>  
<http://www.mindtree.com/sites/default/files/mindtree-anti-slavery-and-anti-human-trafficking-policy.pdf>  
Integrity Policy (<http://www.mindtree.com/code-conduct>)
- P2: <http://www.mindtree.com/sites/default/files/mindtree-sustainability-policy.pdf>  
Also <http://www.mindtree.com/sites/default/files/mindtree-environment-health-and-safety-policy.pdf>
- P3: <http://www.mindtree.com/sites/default/files/mindtree-equal-opportunity-policy.pdf>
- P4: <http://www.mindtree.com/sites/default/files/mindtree-equal-opportunity-policy.pdf>  
Also, Reasonable Accommodation policy (internally published)
- P5: Equal Opportunity policy (<http://www.mindtree.com/sites/default/files/mindtree-equal-opportunity-policy.pdf>)
- P6: <http://www.mindtree.com/sites/default/files/mindtree-environment-health-and-safety-policy.pdf>
- P7: There is no distinct policy on public advocacy. Please refer to the details given under Principle 7 of this Annual Report for details of our advocacy and outreach engagements.
- P8: <http://www.mindtree.com/corporate-social-responsibility-policy>
- P9: <http://www.mindtree.com/code-conduct>

(b) If answer to the question at serial number 1 against any principle, is 'No', please explain why: (Tick up to 2 options)

No.	Questions	P	P	P	P	P	P	P	P
		1	2	3	4	5	6	7	8
1	The company has not understood the Principles								
2	The company is not at a stage where it finds itself in a position to formulate and implement the policies on specified principles								
3	The company does not have financial or manpower resources available for the task								
4	It is planned to be done within next 6 months								
5	It is planned to be done within the next 1 year								
6	Any other reason (please specify)								✓

✓ *There is no distinct policy on public advocacy. However, please refer to the details given under Annexure 7 of this Annual Report for details of our advocacy and outreach engagements*

**3. Governance related to BR**

(a) Indicate the frequency with which the Board of Directors, Committee of the Board or CEO to assess the BR performance of the Company. Within 3 months, 3-6 months, Annually, More than 1 year

We have a Board Committee on CSR. The CSR Committee generally meets on a quarterly basis. Further, the frequency of meetings is determined by the Chairman on need-basis.

(b) Does the Company publish a BR or a Sustainability Report? What is the hyperlink for viewing this report? How frequently it is published?

BRR is published as a part of our annual report every year.

<http://www.mindtree.com/sites/default/files/mindtree-business-responsibility-report-2015-2016.pdf>

Sustainability report is published every year too.

(<http://www.mindtree.com/sites/default/files/mindtree-sustainability-report-2015-2016.pdf>)

**SECTION E: PRINCIPLE-WISE PERFORMANCE**

**Principle 1: Businesses should conduct and govern themselves with Ethics, Transparency and Accountability**

1. Does the policy relating to ethics, bribery and corruption cover only the company? Yes/ No. Does it extend to the Group/Joint Ventures/ Suppliers/Contractors/NGOs /Others?

The policy related to ethics and integrity covers all the units of the company. Contractors are also trained to adhere to our integrity policy, and our suppliers are oriented to our ethical values and policies. Our suppliers are subject to our code of conduct. Our NGO partners are familiarized with our values, principles and policies.

2. How many stakeholder complaints have been received in the past financial year and what percentage was satisfactorily resolved by the management? If so, provide details thereof, in about 50 words or so.

Our grievance redressal mechanisms are open to complaints of a wide nature. The complaints data is given below:

Pending at the beginning of the FY 2016-17	Received during the FY 2016-17 *	Resolved during the FY 2016-17	Pending at the end of the FY 2016-17
1	324	324	1

\* 39 complaints from employees and the rest from shareholders

#### Principle 2 : Businesses should provide goods and services that are safe and contribute to sustainability throughout their life cycle

- List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.  
Our business services are software-based and do not possess ESG risks in their design or delivery. The clean and green processes we deploy in our operations are detailed out in our sustainability reports each year. We report our carbon emissions to CDP every year. Our annual report contains details of our energy conservation measures and are also shared in our Directors Report-Annexure 7. Our CSR endeavors which deploy technology to address social and environmental issues of a larger nature are detailed out in our Directors' Report-Annexure 7.
- For each such product, provide the following details in respect of resource use (energy, water, raw material etc.) per unit of product(optional):  
(a) Reduction during sourcing/production/ distribution achieved since the previous year throughout the value chain?  
(b) Reduction during usage by consumers (energy, water) has been achieved since the previous year?  
Not applicable.
- Does the company have procedures in place for sustainable sourcing (including transportation)?  
(a) If yes, what percentage of your inputs was sourced sustainably? Also, provide details thereof, in about 50 words or so.  
We approach our sourcing with sustainability in mind. It applies to sourcing of materials as well as talent. We invariably source from local suppliers at all our locations, thus reducing transportation costs and footprint. A majority of our procurement gets sourced in this fashion. Local hiring of talent at all levels is also a matter of principle for us. It includes senior levels as well. This is followed by our talent acquisition function, barring a few exceptions.
- Has the company taken any steps to procure goods and services from local & small producers, including communities surrounding their place of work?  
(a) If yes, what steps have been taken to improve their capacity and capability of local and small vendors?  
As mentioned in the above point, local sourcing is a norm for us. Since we also have a focus on minorities and the disadvantaged members of the society, this translates into a natural preference for minority-based, women-led, diverse set of suppliers in our supply chain. We do not have any specific initiatives to enhance their capabilities at present.
- Does the company have a mechanism to recycle products and waste? If yes what is the percentage of recycling of products and waste (separately as <5%, 5-10%, >10%). Also, provide details thereof, in about 50 words or so.  
Mindtree is committed to an efficient waste management system. To reduce landfills, we undertake food waste composting on our premises, responsible disposal of hazardous waste, as well as a considerable amount of recycling of dry waste. Our recycling stands at 89.28% for 2016-17.

#### Principle 3: Businesses should promote the well-being of all employees

- Please indicate the Total number of employees: 16,470
- Please indicate the Total number of employees hired on temporary/contractual/casual basis: 1,131
- Please indicate the Number of permanent women employees: 4,668
- Please indicate the Number of permanent employees with disabilities: 46
- Do you have an employee association that is recognized by management? No.
- What percentage of your permanent employees is members of this recognized employee association? NA
- Please indicate the Number of complaints relating to child labor, forced labor, involuntary labor, sexual harassment in the last financial year and pending, as on the end of the financial year.

No.	Category	No of complaints filed during the financial year	No of complaints pending as on end of the financial year
1	Child labor/forced labor/involuntary labor	0	0
2	Sexual harassment	2	0
3	Discriminatory employment	0	0

- What percentage of your under mentioned employees were given safety & skill upgradation training in the last year?  
(a) Permanent Employees: 96.75%

- (b) Permanent Women Employees: 91.09%
- (c) Casual/Temporary/Contractual Employees: 18.92%
- (d) Employees with Disabilities: 69.57%

**Principle 4 : Businesses should respect the interests of, and be responsive towards all stakeholders, especially those who are disadvantaged, vulnerable and marginalized.**

1. Has the company mapped its internal and external stakeholders?  
Yes
2. Out of the above, has the company identified the disadvantaged, vulnerable & marginalized stakeholders?  
Yes
3. Are there any special initiatives taken by the company to engage with the disadvantaged, vulnerable and marginalized stakeholders. If so, provide details thereof, in about 50 words or so.

Mindtree undertakes a formal listing of internal and external stakeholders, which includes marginalized, disadvantaged and vulnerable segments of the society. The disadvantaged sections of the society is our key beneficiary segment for all of our CSR endeavors. Our CSR Charter mentions these segments as our beneficiaries and directs our focus and action towards these segments. Differently-abled, under privileged people from the rural hinterlands of the country, especially children, youth and women from these backgrounds are at the very centre of our attention and action under the wings of our CSR programs.

**Principle 5 : Businesses should respect and promote human rights**

1. Does the policy of the company on human rights cover only the company or extend to the Group/Joint Ventures/Suppliers/Contractors/NGOs/Others?  
Respect for human rights is innate to our culture, and encompasses all our operations, functions, levels, extending beyond the boundaries of our formal organization, touching our contractual hires, suppliers, partners and others.
2. How many stakeholder complaints have been received in the past financial year and what percent was satisfactorily resolved by the management?  
Refer to point 7 under principle 3 above.

**Principle 6 : Business should respect, protect, and make efforts to restore the environment**

1. Does the policy related to Principle 6 cover only the company or extends to the Group/Joint Ventures/Suppliers/Contractors/NGOs/others.  
Our EHS policy covers all our locations, and permanent and contractual employees.
2. Does the company have strategies/ initiatives to address global environmental issues such as climate change, global warming, etc.? Y/N. If yes, please give hyperlink for webpage etc.  
The company endorses the precautionary principle and commits to conserve resources through multiple strategies. Ecological sustainability is a key pillar of our sustainability framework. Details of our endeavors can be found on <http://www.mindtree.com/about-us/sustainability>, under ecological sustainability.
3. Does the company identify and assess potential environmental risks? Y/N  
No, environmental risks are covered and owned by respective function heads, and do not get exclusively covered for formal risk evaluation in our ERM framework on a regular basis. We respond to risks of natural disaster with alacrity, and do consider broad global risks in the ERM framework; we do not have formal/exclusive focus on potential environmental risks under our formal framework.
4. Does the company have any project related to Clean Development Mechanism? If so, provide details thereof, in about 50 words or so. Also, if Yes, whether any environmental compliance report is filed?  
No. Not applicable.
5. Has the company undertaken any other initiatives on – clean technology, energy efficiency, renewable energy, etc.? Y/N. If yes, please give hyperlink for web page etc.  
Yes, we are committed to clean technology initiatives. Please refer to our Directors' Report-Annexure 6 in this report and also the section on Conserving Resources in our Sustainability Report. Also, please check <http://www.mindtree.com/about-us/sustainability>.
6. Are the Emissions/Waste generated by the company within the permissible limits given by CPCB/SPCB for the financial year being reported?  
Yes, our emissions and waste generation lie within the permissible limits.
7. Number of show cause/ legal notices received from CPCB/SPCB which are pending (i.e. not resolved to satisfaction) as on end of Financial Year.  
Nil

**Principle 7 : Businesses, when engaged in influencing public and regulatory policy, should do so in a responsible manner**

1. Is your company a member of any trade and chamber or association? If Yes, Name only those major ones that your business deals with:
  - (a) CII
  - (b) NASSCOM

- (c) FICCI
- (d) ASSOCHAM
- (e) BCIC

2. Have you advocated/lobbied through above associations for the advancement or improvement of public good? Yes/No; if yes specify the broad areas ( drop box: Governance and Administration, Economic Reforms, Inclusive Development Policies, Energy security, Water, Food Security, Sustainable Business Principles, Others)

Our leadership has actively participated in industry association platforms and advocated issues and actions for inclusive development policies, sustainable business principles, in addition to a range of policy advocacy and practice-sharing across themes such as workplace engagement, diversity, women-friendly practices, anti-sexual harassment mechanisms and so on.

**Principle 8 : Businesses should support inclusive growth and equitable development**

1. Does the company have specified programmes/initiatives/projects in pursuit of the policy related to Principle 8? If yes details thereof.  
Mindtree has a specific CSR policy to ensure inclusion. Details of our inclusive projects are shared in the Directors' Report-Annexure 7.
2. Are the programmes/projects undertaken through in-house team/own foundation/external NGO/government structures/any other organization?

Our inclusion programs are run by Mindtree Foundation, in partnership with several NGOs who take our plans forward at the grass-root level. The Foundation is actively involved at the grass-root level too, ensuring clarity in need gaps and exact match of solutions. The technology-leveraged initiatives are also taken to the field through a network of external partners who extend the reach of the impacts.

3. Have you done any impact assessment of your initiative?  
Our direct involvement at the field-level of social change enables us to constantly assess, monitor and improve our performance. We deploy an effectiveness index to measure the effectiveness of our Foundation's interventions. We do not carry out third party impact assessments of our CSR work.
4. What is your company's direct contribution to community development projects- Amount in INR and the details of the projects undertaken?  
Please refer to Annexure 7, Directors' Report.
5. Have you taken steps to ensure that this community development initiative is successfully adopted by the community? Please explain in 50 words, or so.

All our project designs include successful adoption by beneficiaries as a critical component. Our projects are never considered complete without ensuring high adoption. Our direct involvement makes such a completion both possible and feasible. This is a unique way in which we choose to serve our communities. It helps us to define grass-root level problems in a holistic way and design integrated solutions. Our constant commitment to our on-going projects, not subject to fluctuations in our fortune, if any, goes a long way in ensuring that the communities adopt the services for a longer time frame.

**Principle 9: Businesses should engage with and provide value to their customers and consumers in a responsible manner**

1. What percentage of customer complaints/consumer cases are pending as on the end of financial year.  
Nil
2. Does the company display product information on the product label, over and above what is mandated as per local laws? Yes/No/N.A. / Remarks(additional information)  
Not applicable, since ours is a software solutions Company
3. Is there any case filed by any stakeholder against the company regarding unfair trade practices, irresponsible advertising and/or anti-competitive behaviour during the last five years and pending as on end of financial year. If so, provide details thereof, in about 50 words or so.  
Nil
4. Did your company carry out any consumer survey/ consumer satisfaction trends?  
We carry out an annual customer experience survey to get customer feedback on our performance. We solicit feedback on four key measures—satisfaction, loyalty, advocacy and value for money. Trends show us receiving high scores across all measures. (Graph displayed in Management Discussion and Analysis of this report.)