Business Responsibility Report

Responsibility is an inherent part of being Mindtree. The Company was born 18 years ago as an enterprise offering IT solutions while making societies flourish. Embedding of social wellbeing into our vision and mission makes our business responsible.

A strong corporate governance foundation, responsibility for climate change mitigation and a nurturing approach to our people are the bases of forming our sustainability framework. The pillars of our sustainability framework are: Governance and advocacy, Workplace sustainability and Ecological sustainability. Our social inclusion ideology manifests as our CSR policy, board level committee and a steering committee on CSR. Sustainability framework and CSR framework together complete our responsibility agenda.

We are a UNGC signatory, and endorse globally relevant business responsibility principles such as human rights, ethics and precautionary principles and so on. Committed to transparency as a key value, we report our carbon footprint annually through CDP reports and our sustainability performance through GRI-based sustainability reports. We endorse National Voluntary Guidelines for responsible Business (NVG) and map our report to its principles and core elements.

A detailed policy architecture we have built is a testimony to our governance framework. The range of policies covers and guides several domains of business responsibility, adhering to statutory requirements and going beyond them. Ethics, integrity, human rights, social inclusion, stakeholder engagement, diversity, inclusion of people with disability, non-discrimination, health and safety and environmental responsibility are some of the areas where we have exclusive policies, plans and initiatives to ensure responsible business practices.

Our approach to workplace is apparent in referring to our employees as 'people' and not as 'human resources'. A varied set of engagement platforms and an ever evolving set of learning and development programs keep our talent pool engaged, energized and thriving. We leverage technology in a big way to engage and develop our talent pool, and have launched innovative platforms to reskill and multiskill them, in response to the external trends in new technology, automation and so on. Details of our interesting initiatives can be found in our sustainability report.

The approach to environmental sustainability is a combination of responsibility and smart business. The initiatives set forth for energy, emission, water and waste management have brought in constant savings for us while conserving resources of the planet as well. Our green buildings with their state-of the art- building management systems and energy efficient processes, now being backed by IOT, demonstrate our commitment to conservation, and our plans for solar power testify our ambitions in renewables. More details can be found in our sustainability report as well as in Annexure 6 under Directors' Report.

CSR at Mindtree is deployed through initiatives of the Mindtree Foundation in the form of social inclusion projects and the 'I Got' suite of platforms which bring in a technology leverage to solve social and environmental issues. The Mindtree Foundation, guided by the CSR policy, engages in grass roots level community projects, offering integrated solutions to the disadvantaged.

(Details are available in Annexure 7 of our Directors' report in this annual report and in our sustainability report.)

The following sections pertain to information asper 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 Ltd.
3. Registered address: Mindtree Ltd, Global Village, RVCE Post, Mysore Road, Bangalore-560059, Karnataka, India
4. Website: www.mindtree.com
5. E-mail id: investors@mindtree.com
6. Financial Year reported: 01 April, 2017 -31 March 2018
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, Automation, Packaged Solutions. The other services include Application Development & Maintenance, Infrastructure Management, EAI, R&D, Testing, Consulting, Sales force and SAP.
9. Total number of locations where business activity is undertaken by the Company

    (a) Number of International Locations: 17

    (b) Number of National Locations: 5
10. Markets served by the Company – Local/State/National/International: America, Asia Pacific, Europe, India

SECTION B: Financial Details Of The Company (On Consolidated basis)

1. Paid up Capital (INR): 1,639 million
2. Total Turnover (INR): 54,628 million
3. Total profit after taxes (INR): 5,701 million
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:

    A detailed table is disclosed in the Directors' report- Annexure 7.

SECTION C: Other Details

1. Does the Company have any Subsidiary Company/ Companies?

   The Company has 4 direct subsidiaries and 3 Step subsidiaries.

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	Parthasarthy.NS@mindtree.com

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

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

No.	Questions	P1	P2	P3	P4	P5	P6	P7	P8	P9
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) People policies including POSH, nondiscrimination, ethics such as whistle blower policy, anti-slavery policy etc. are as per the national and global norms. Other policies (e.g. sustainability, CSR, EH&S) have originated internally from our values.	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

Website links to our policies:

P1: https://www.mindtree.com/sites/default/files/2018-01/Mindtree%20Whistle%20Blower%20Policy%20-%20Jan%208th%202018.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: https://www.mindtree.com/sites/default/files/2017-12/Equal%20Opportunity%20Policy%20New.pdf

P4: https://www.mindtree.com/sites/default/files/2017-12/Equal%20Opportunity%20Policy%20New.pdf
Also, Reasonable Accommodation policy (internally published)

P5: Equal Opportunity policy (https://www.mindtree.com/sites/default/files/2017-12/Equal%20Opportunity%20Policy%20New.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	P1	P2	P3	P4	P5	P6	P7	P8	P9
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. Please refer to the details given under Annexure 7 of Directors' 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 as a part of our annual report and Sustainability report both are published every year.(http://www.mindtree.com/about/sustainability)

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?

Our policy extends to all our units, and our trainings on ethics and integrity cover all our contractors. Code of conduct for suppliers orients them to our expectations on ethics. Our NGO partners are well versed with and attuned to our values.

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. We had 1 complaint pending redressal at the beginning of the year, we have received 372 stakeholder complaints in the year 2017-18 and resolved 372, with 1 pending due for redressal.

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

1. List up to 3 of your products or services whose design has incorporated social or environmental concerns, risks and/or opportunities.

Being a software solutions Company, our products and services do not involve ESG risks. Our processes and operations follow the precautionary principles and strive for resource conservation at all levels. Our energy, water, emission management processes are detailed out in our sustainability report, with our emissions being reported under CDP regularly. Our CSR platforms (e.g. IGG) leverage technology in a big way to address social risks and create social opportunities.

2. 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.

3. 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.

    Local sourcing applies to materials and talent as well at Mindtree. Local hiring is followed as a norm at all levels. Our procurement function sources predominantly from local sources close to the location of use and consumption, as a matter of principle and as smart business strategy to cut down on transit and time. This applies to our operations across the globe.

4. 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?

    Our norm of local sourcing also has a focus on minorities and the disadvantaged members of the society. Our procurement initiatives have identified a set of women-based enterprises and have included them in the supply chain. We do not have any specific initiatives to enhance their capabilities at present.

5. 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.

    Recycle and reuse is a principle for us. Our recycling proportion has always been at high levels, thanks to our efficient segregation which has been improving further constantly. Our food composting converts our wet waste into manure that goes back to the earth. We have not only been efficient in our waste management but also managed to contain the magnitude of waste generated in the first place, through awareness campaigns and behavioral corrections. Our recycling stands at 88.99% in the year 2017-18.

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

1. Please indicate the Total number of employees: 17723

2. Please indicate the Total number of employees hired on temporary/contractual/casual basis: 1319

3. Please indicate the Number of permanent women employees: 5187

4. Please indicate the Number of permanent employees with disabilities: 46

5. Do you have an employee association that is recognized by management? No.

6. What percentage of your permanent employees is members of this recognized employee association?

    NA

7. Please indicate the Number of complaints relating to child labor, forced labor, involuntary labor, and 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	1	0
3	Discriminatory employment	0	0

8. What percentage of your under mentioned employees were given safety & skill upgradation training in the last year?

    (a) Permanent Employees: 67.71%

    (b) Permanent Women Employees: 73.38%

    (c) Casual/Temporary/Contractual Employees: 22.52%

    (d) Employees with Disabilities: 65.22%

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.

    Our CSR policy makes it a point to focus attention on the disadvantaged segments of the society and directs the CSR efforts to change their lives. People with disability, poor, uneducated people from the rural hinterlands of the country, especially children, youth and women from these backgrounds are the key beneficiaries of our CSR endeavors, often assisted by our employee volunteers in several ways. Our CSR endeavors (detailed in annual report as well as in sustainability report) give a detailed view of our initiatives and the way we impact these segments.

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?

   All our operations, functions, people, contractors, supply chain partners are subject to our stance on human rights.

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.

   All our locations- permanent and contractual employees are covered in our EHS policy.

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 has a number of initiatives for resource conservation under the Ecological sustainability pillar of our sustainability framework. Climate change is a risk we are committed to address in varied ways, and taking significant steps in renewable energy. Please refer to our sustainability report 2017-18 (http://www.mindtree.com/sustainability/mindtree-sustainability-report.pdf)

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/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 generated 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

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 has advocated issues and actions in areas such as 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, and 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.

   The Directors' Report-Annexure 7 shares details of our social inclusion initiatives. Our sustainability report carries a broad picture of our inclusion impacts.

2. Are the programmes/projects undertaken through in-house team/own foundation/external NGO/government structures/any other organization?

   The Mindtree Foundation is supported by a set of committed NGO partners who undertake the execution of our social inclusion projects. Mindtree Foundation leadership team is deeply engaged and involved in the execution guidance and monitoring, since we believe in grassroots work with personal involvement. Thousands of our people contribute as volunteers throughout the year, bringing in personal involvement to the cause. Our technology platform for social inclusion works with a diverse set of external partners.

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 the interventions by our Foundation. We did not carry out third party impact assessments of our CSR work yet.

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.

Our social inclusion initiatives are integrated models which involve several stakeholders at the grassroots. All our projects are long term projects as well. This enables us to monitor, follow through and sustain the initiatives from design to adoption constantly. In our experience, community has not only benefitted but also has participated enthusiastically, often helping us to evolve our projects to the next level. By observing the impacts, the Government of Karnataka has adopted our Sikshana Education project and the Samruddhi Abhiyaan to the Government Schools across entire Karnataka state.

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 in order to obtain customer feedback on our performance. We solicit feedback on four key measures- satisfaction, loyalty, advocacy and value for money. Trends show high scores across all measures. The year 2017-18 has given us highest scores so far, with above industry average scores on overall satisfaction and advocacy. (Graph displayed in Management Discussion Analysis of this report.)