

**MINDTREE'S ANTI SLAVERY AND ANTI HUMAN TRAFFICKING POLICY STATEMENT UNDER SECTION 54(1) OF UNITED KINGDOM THE MODERN SLAVERY ACT FROM 2015**

MINDTREE Limited's ("MINDTREE") commitment to human rights focuses on subjects such as forced labor, slavery, child labor and human trafficking and thereby Mindtree, any and all its affiliated company are committed to ensure that its employees ("Minds") and suppliers across the globe take appropriate steps to mitigate the risk of human trafficking and slavery in any part of its business.

**ABOUT MINDTREE**

MINDTREE [NSE: MINDTREE] delivers digital transformation and technology services from ideation to execution, enabling Global 2000 clients to outperform the competition. "Born digital," Mindtree takes an agile, collaborative approach to creating customized solutions across the digital value chain. At the same time, our deep expertise in infrastructure and applications management helps optimize your IT into a strategic asset. Whether you need to differentiate your company, reinvent business functions or accelerate revenue growth, we can get you there.

**SUPPLY CHAIN OVERVIEW**

Mindtree's supply chain is integrally linked to its successful growth and works end-to-end to bring specific industry experience as well as a cross-industry perspective to help seed innovation. At an aggregate level, majority of our suppliers are based in India and most of the procurement for the year was from India based suppliers. Mindtree has established a central procurement department based out of Bangalore, India. In Mindtree, we have automated the process of our supply chain management and we have developed an automated vendor portal which covers all stages from procurement to process. This portal is a strategic web-based solution used by Mindtree for end to end supplier onboarding across all business categories. This application allows incumbent suppliers to create their profile with Mindtree in order to provide goods and/or services in future course of time and conduct activities like new registration, supplier code modification, extension, blocking/unblocking etc. As the first step in this program, it is now made mandatory for all the suppliers to accept and sign the Supplier Code of Conduct (SCOC) which is enclosed to any Purchase Order issued by Mindtree and/or its affiliated company.

**POLICIES**

Mindtree is committed to ensure that there is no modern slavery or human trafficking in any part of our business including our supply chains. Mindtree has internal policies and practices which focus on slavery and human trafficking and is part of a larger effort of supply chain transparency and accountability and respect for human rights. These internal policies are available on MINDTREE intranet named "*People Hub*" and policies such as the Mindtree Code of Conduct or the CSR Policy are available on [www. Mindtree.com](http://www.Mindtree.com).

Mindtree has taken multiple actions to verify the absence of forced labor, slavery and human trafficking in and part of its business and its supply chain.

**DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of Mindtree initiative to identify and mitigate risk –

1. Mindtree runs licensed premises as managed houses to ensure optimum control of the work environment;
2. Mindtree limits the geographical scope of its licensed premises to ensure optimum supervision of the use of its properties;
3. Where possible Mindtree builds long standing relationships with local suppliers and tenancy customers and make clear Mindtree's expectations of business behavior;
4. Mindtree has in place systems to encourage the reporting of concerns and the protection of whistle blowers.

Mindtree's supplier engagement program integrates a program of continuing evaluation, capacity building and risk management with a focus on human rights and labor practices and regulatory compliance through ongoing periodic

assessments done by both external consultants and review by Internal Audit team. Mindtree's expect that these steps will encourage responsible behavior from our partners.

#### **ADHERENCE TO MINDTREE'S VALUES**

Like any other critical subject from Discrimination to Sexual Harassment or Conflict of Interest Mindtree has zero tolerance to slavery and human trafficking. Mindtree expects all of those associated with Mindtree including its employees ("Minds"), supply chain and contractors to adhere and strictly comply with Mindtree's values. The legal and compliance, human resources and central procurement organization are responsible for ensuring compliance across the organization.

#### **TRAINING AND AWARENESS**

Mindtree offers training through forums and workshops to its employees who are responsible for supply chain management and its suppliers on slavery, specifically regarding how to identify and respond to supply chain issues in accordance with the applicable laws.

#### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

MINDTREE uses the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

1. Periodic in-house audits by internal audit team;
2. Use of labor monitoring and payroll systems; and
3. Level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, Mindtree's expectations.

#### **FURTHER STEPS**

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we will continue to improve our processes, continue to encourage our Principals and staff to report any concerns they have."

This Policy statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement of Mindtree Limited for the Financial year ended 31.03.2018.

Changes to this Policy: Please note that this policy may change from time to time. Please review the policy periodically for changes.