

WHISTLEBLOWER POLICY

1. INTRODUCTION

- 1.1 Mindtree Minds are guided by Mindtree's value systems i.e. collaborative spirit, unrelenting dedication and expert thinking. These values are the very fabric of Mindtree Limited (“**Mindtree**” or the “**Company**”) and its subsidiary companies and have been integrated into every system and process of Mindtree. A Mindtree Mind is expected to conduct himself/herself with the highest standard of Integrity at all times.
- 1.2 Mindtree has adopted the Code of Conduct, Integrity & Ethics Policy (“**Integrity Code**”). <https://peoplehub.mindtree.com/sites/Policies/WandE/Pages/Code-of-conduct.aspx?NewLocation=India> that lays down principles and standards that govern every business action of a Mindtree Mind. As an organization, Mindtree treats integrity as paramount to Mindtree’s operations and therefore firmly believes that there are no shades of grey on any matter(s) concerning integrity. Any potential violation of the Integrity Code, however insignificant, is a cause for extreme concern and violations of Integrity Code is dealt with zero tolerance. Every Mindtree Mind is expected to comply with the Integrity Code and also promptly point out any actual or suspected violation of the Integrity Code.
- 1.3 Mindtree has adopted the Code of Conduct for prevention of Insider Trading in the securities of Mindtree Limited (“**PIT Code**”) and Code of Fair Practices & Disclosure (“**Fair Disclosure Code**”) in compliance with the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as may be amended from time to time (“**PIT Regulations**”). The Fair Disclosure Code and the PIT Code have been adopted to regulate the fair disclosure of unpublished price sensitive information and to regulate, monitor and report trading by Mindtree Minds in securities of Mindtree.
- 1.4 Section 177 of the Companies Act, 2013 read with Rule 7 of the Companies (Meetings of Board and its powers) Rules, 2014, Regulation 22 of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“**LODR Regulations**”) and Regulation 9A of PIT Regulations, requires every listed company to establish a vigil mechanism for its stakeholders, including individual employees, their representative bodies

and the directors to report genuine concerns, and to freely communicate their concerns about illegal or unethical practices.

- 1.5 Therefore, the Board of Directors of Mindtree have framed a robust vigil mechanism/ Whistleblower Policy to provide a platform for Mindtree Minds to raise concerns or complaints to the management of Mindtree of any incident or violation, in relation to actual or suspected violations of applicable laws and regulations including Mindtree’s Integrity Code, PIT Code, Fair Disclosure Code and other policies and codes of the Company.

2. POLICY OBJECTIVE

- 2.1 Mindtree is committed to comply with the highest standards of ethical, moral, professional and legal conduct in Mindtree’s business operations. To maintain these standards, this Whistleblower Policy provides a platform that encourages Whistleblowers, having complaints of actual or suspected incidents of unethical practices, violation of applicable laws and regulations including the Integrity Code, PIT Code and Fair Disclosure Code, to promptly come forward and express the same without any fear of retaliation (hereinafter referred to as a “**Whistleblowers**”).
- 2.2 The Whistleblower Policy aims to provide the appropriate platform and protection for Whistleblowers to make Secured Disclosures of any actual or suspected incidents of unethical practices, violation of applicable laws and regulations including the Integrity Code, PIT Code, Fair Disclosure Code. Mindtree will investigate such complaints speedily, confidentially and in an impartial manner and take appropriate action to ensure that the requisite standards of professional and ethical conduct are always maintained. The Whistleblower Policy empowers the “Ethics and Compliance Committee”) to investigate or direct an investigation into complaints and concerns raised by a Whistleblower.
- 2.3 The Whistleblower Policy does not release a Mindtree Mind from his/her duty of confidentiality in the course of his/her work nor can the Whistleblower Policy be used as a route for raising malicious or unfounded allegations against a Respondent.

3. DEFINITIONS

- 3.1 “**Audit Committee**” is the audit committee constituted by the Board of Directors of Mindtree

in accordance with section 177 of the Companies Act, 2013 read with Rule 6 of the Companies (Meetings of Board and its Powers) Rules, 2014 and Regulation 18 of LODR Regulations.

- 3.2 "**Chief Ombudsman**" Erwan Carpentier, SVP & General Counsel, who can be contacted at Erwan.carpentier@mindtree.com.
- 3.3 " Ethics and Compliance Committee" of Mindtree is a management committee which shall be represented by a minimum of three members during the proceedings and investigation of the Secured Disclosure. The current members of the Ethics and Compliance Committee are detailed below: The tenure of Ethics and Compliance Committee members shall be for a period of 3 years from the date of appointment.

Ethics and Compliance Committee	Committee Members
Appellate Authority	Gaurav Johri
Presiding officer	Bismi Ravindran
Bangalore Location Committee	Vedavalli S
	Rohit Srinivasan
	Akansha Verma
	Padmanabhan Kalyanasundaram
	Rama Ramdas Shenoy
	Jaganath Ram Shankar
	Raghavendra Prasad Seshadri
	Chandramouli Jayaraman
	Jency Elizabeth Peter
Chennai Location Committee	Anuradha Rukmangathan
	Karthikeyan Ramasubramanian
Hyderabad Location Committee	Jyothirmai Suri
	Krishna Gollapudi
Pune Location Committee	Rajesh Patil

	Samidha Joshi
Kalinga Location Committee	Pramod Prakash Panda
	Shaheen Sultana
US Location Committee	Philip Goldstein
	Nidhi Alexander
UK/EU Location Committee	Chandrashekar Nair
	Guita Blake
Australia Committee	Anoop George
	Shalini Singh
APAC Committee	Sanoj Kumar
ROW (Rest of World)	Bangalore committee members

- 3.4 **“Mindtree Mind”** is every employee who is or was on the core rolls or on contract rolls, permanent or temporary employee, trainee, apprentice, consultant, officer and manager of Mindtree or its subsidiary companies.
- 3.5 **"People Hub"** is the Intranet of Mindtree where Secured Disclosures can be made.
- 3.6 **"Prevention of Sexual Harassment Committee"** or **"POSH Committee"** is the committee constituted to investigate complaints relating to sexual harassment at workplace in terms of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules made thereunder (**"POSH Laws"**).
- 3.7 **“Prevention of Insider Trading Committee”** or **“PIT Committee”** is the Committee constituted to investigate complaints relating to the violation of the PIT Regulations, the PIT Code and the Fair Disclosure Code.
- 3.8 **"Respondent"** includes a person/entity against whom a complaint is made by a Whistleblower under the Whistleblower Policy.
- 3.9 **"Secured Disclosure"** is a written complaint made by a Whistleblower which discloses or demonstrates information that may evidence an unethical, improper or illegal activity of a

Respondent. The Secured Disclosure should be factual and not speculative and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the complaint.

3.10 "**Sexual Harassment**" would mean any action as defined under Mindtree's Policy on Prevention of Sexual Harassment.

3.11 "**Whistleblower**" is the Mindtree Mind, any Mindtree trainee, intern, apprentice, staff contractor, external advisor, external consultant, vendor, customer who has made a Secured Disclosure.

3.12 All terms used in the Whistleblower Policy, but not defined above shall have the meanings ascribed to them in the Companies Act, 2013, Securities and Exchange Board of India Act, 1992, PIT Regulations or LODR Regulations, as the case may be.

4. INTERPRETATION

In the Whistleblower Policy, unless the context otherwise requires:

1.1.1. headings and underlining are for convenience only and shall not affect the interpretation or construction of the Whistleblower Policy or any provisions contained herein.

1.1.2. words importing the singular shall include the plural and *vice versa*; and words importing either gender shall include the other.

5. SCOPE

5.1 Eligibility

Every Whistleblower is eligible to make Secured Disclosures under the Whistleblower Policy in relation to matters concerning Mindtree and its subsidiary companies.

5.2 In scope cases:

The Whistleblower Policy *inter alia* covers the following illustrative incidents or situations:

- An incident of intentional non-compliance with applicable laws/regulations or a criminal offence;
- abuse of authority or a violation of corporate governance;

- an environment, health or safety risk or damage to others at Mindtree or general public;
- a misrepresentation of Mindtree's accounting records, financial statements or reports, or breach of fiduciary responsibility;
- pilferage or theft of proprietary or confidential information of Mindtree or its customers such as a leak of a Mindtree's confidential information on any social media (LinkedIn, Twitter, Facebook or any other platform);
- misuse or breach of intellectual property rights of Mindtree, of its customer or of third party entities;
- a breach of a policy/code of Mindtree including the Conflict of Interest Policy, the PIT Code, the Fair Disclosure Code and the Integrity Code and the Anti-Bribery and Anti-Corruption Policy;
- any kind of communication, allowing access to or procurement of unpublished price sensitive information as referred under Regulation 3 of the PIT Regulations and any other act which may amount to misuse of unpublished price sensitive information or is prohibited under the PIT Regulations: and
- any act of abuse, bias, corruption, discrimination, duress, financial irregularities, gross wastage/embezzlement of the funds, exploitation, favour, fraud, workplace harassment (including physical or psychological harassment or bullying), imprudence, malpractice, neglect, unethical, waste, wrongdoing by Mindtree Minds.

5.3 *Out of the scope cases:*

The Whistleblower Policy does not cover the following illustrative incidents or situations:

- Complaints of Sexual Harassment against any Mindtree Mind shall be handled by the POSH Committee in compliance with the POSH Laws; and
- complaints that purely relate to a Mindtree Mind's performance, appraisal rating, pay increase or a general personnel or administration issue that are not the consequences of any act or practice conducted under clause 5.2, the People Function of Mindtree will handle such complaints.

6. ROLE OF A WHISTLEBLOWER

6.1 The Whistleblower's role is that of a reporting party with reliable information. The

Whistleblower is not required or expected to act as an investigator or finder of facts, nor would he/she determine the appropriate corrective or remedial action that may be warranted in a given case. A Whistleblower should not act on his/her own in conducting any investigative activities nor does he/she have a right to participate in any investigation undertaken by Mindtree.

- 6.2 While the Whistleblower Policy is intended to provide protection to a Whistleblower who makes a Secured Disclosure, it is important to note that in case of any repeated frivolous disclosures or in the case of a false or bogus disclosure made with *mala fide* intent, the Mindtree Mind would be subject to appropriate disciplinary action. Therefore, protection under the Whistleblower Policy shall not mean protection from disciplinary action arising out of false, frivolous or bogus allegations made by a Whistleblower. Further, the Whistleblower shall indemnify Mindtree, including its directors or Mindtree Minds against any issues, claims, allegations, charges, expenses of any kind made either by the Respondent, or any third party at any time hereafter arising out of or related to the Whistleblower's frivolous Secured Disclosure.

7. PROCEDURE

The Whistleblower Policy outlines the procedure for raising a complaint and for addressing the complaint.

- 7.1 A Whistleblower intending to make a Secured Disclosure against a Respondent must post the same in the Whistleblower section on People Hub (Available at <https://peoplehub.mindtree.com/sites/Policies/WandE/Pages/Whistle-Blower-Policy.aspx>).

The Whistleblower may also lodge his/her complaint by email to whistleblower@mindtree.com or by courier addressed to Mindtree Limited, Ethics and Compliance Committee Global Village, RVCE Post, Mysore Road, Bengaluru - 560 059, India. On submission of the Secured Disclosure, the Ethics and Compliance Committee will act on the Secured Disclosure.

- 7.2 A Whistleblower is expected to make a Secured Disclosure that is factual and not speculative and is not in the nature of a mere conjecture, surmise or rumour. It must be made in good faith for the purpose of seeking a redress and should contain as much specific information as is known to the Whistleblower at that point of time. The disclosure must be in as much detail as

is possible by the Whistleblower.

- 7.3 The Ethics and Compliance Committee shall, where it deems necessary, conduct a formal investigation based on the information provided in the Secured Disclosure. The Respondent and the witnesses identified by the Ethics and Compliance Committee have responsibility to cooperate with the Ethics and Compliance Committee on the investigation by reporting all pertinent facts and concealing none. During the course of investigation, Ethics and Compliance Committee will always give the Respondent a fair opportunity of being heard in respect of the Secured Disclosure.
- 7.4 Ethics and Compliance Committee may, at its sole discretion, involve other investigators such as personnel from the human resources, finance and accounts, administration, internal audit, chief information officer, legal or any other department of Mindtree that possesses specialized skills necessary for the purpose of investigation. Every department has a duty to support the Ethics and Compliance Committee. In certain critical situations the Ethics and Compliance Committee may hire the services of an external organization including a lawyer, law firm, chartered accounting firm and electronic discovery services.
- 7.5 The Ethics and Compliance Committee will not take any statement from a Respondent or a witness under duress or coercion.
- 7.6 Where the Ethics and Compliance Committee decides to conduct interviews, it shall not voice or video-record the interview without the prior written consent of the person being interviewed provided the same is permitted under the law. The person being interviewed cannot, in any circumstance, record the interview.
- 7.7 The Respondent, Whistleblower or a witness who is being interviewed cannot involve the services of an advocate or a third party in the investigation process or be present in the interview room.
- 7.8 The Ethics and Compliance Committee is vested with the responsibility of conducting a fair and impartial investigation into a Secured Disclosure. If at the conclusion of its investigation, Ethics and Compliance Committee determines that a violation has occurred, Ethics and Compliance Committee shall take effective remedial action commensurate with the nature of the offense. This action may include disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further

violations of Mindtree's internal policies/codes including, the Integrity Code, PIT Code and Fair Disclosure Code.

- 7.9 If the Respondent to the Secure Disclosure is a member of the Ethics and Compliance Committee, the disclosure shall be routed to the Audit Committee. In such circumstances, the Respondent shall not be a part of the Ethics and Compliance Committee hearing the matter raised in the Secured Disclosure.
- 7.10 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.
- 7.11 The Ethics and Compliance Committee shall make a detailed written record of the Secured Disclosure. The record shall contain the following particulars:
- Facts pertaining to the concern or complaint;
 - Whether the same Secured Disclosure was raised previously by anyone, and if so, the outcome thereof;
 - Whether any Secured Disclosure was raised by the Whistleblower previously against the same Respondent or any other, and if so, the outcome thereof;
 - The financial/other loss which has been incurred/would have been incurred by Mindtree; Findings of the Ethics and Compliance Committee; and The recommendations of the Ethics and Compliance Committee on disciplinary/other actions including a recommendation of a correction of process or amendment of a policy/code.
- 7.12 Ethics and Compliance Committee shall complete its investigation within 90 working days from the date of Secured Disclosure. Ethics and Compliance Committee will report a summary of any Secured Disclosure to the Chief Ombudsman before submitting the final report to the Audit Committee in accordance with clause 7.30.
- 7.13 The Chief Ombudsman who should not be aware of the Secured Disclosure discussed at the Ethics and Compliance Committee level, shall review the report within three business days with all due care, impartiality and applying the most robust principles of fair justice and always keeping in mind the basics of presumption of innocence. The Chief Ombudsman shall revert to the Ethics and Compliance Committee within these 3 business days by giving his written non-binding opinion concerning the Secured Disclosure and the report to be submitted to the

Audit Committee. The Chief Ombudsman's opinion and position shall not be construed as replacing the Audit Committee's recommendations.

- 7.14 Any Respondent is deemed innocent unless the outcome of the investigation is concluded by the Ethics and Compliance Committee, or as the case may be the Audit Committee, against such Respondent.
- 7.15 In case a Secured Disclosure is not proved or is unsubstantiated, the Ethics and Compliance Committee will close the matter with appropriate noting in its records.
- 7.16 Depending on the seriousness of the Secured Disclosure, the Ethics and Compliance Committee may refer the matter to the Chief Ombudsman with recommended disciplinary action and preventive measures, if any.
- 7.17 The Chief Ombudsman may, if thinks fit, further refer to the Audit Committee for necessary action with its proposal. In case the Audit Committee thinks that the matter is even more serious, it can further place the matter before the Board of Directors of Mindtree with its recommendations. The Board may decide the matter as it deems fit.
- 7.18 Respondent will be informed of the outcome of the investigation. Any public disclosure of the investigation results can be done only after a determination by the Ethics and Compliance Committee. The Whistle blower will also be informed of the broad outcome but in no circumstance will the Ethics and Compliance Committee will be bound to share with the Whistleblower the full report relating to a Secured Disclosure. Also, the Ethics and Compliance Committee is not bound to accept the recommendations, if any, of action against the Respondent made by the Whistleblower.
- 7.19 In exceptional cases, where the Whistleblower is not satisfied with the outcome of the investigation and the decision, he or she may make a direct appeal to Chief Ombudsman.
- 7.20 The Whistleblower, the Respondent and the members of the Investigation Team and the Chief Ombudsman have a duty of confidentiality and must not share the fact of the Secured Disclosure and details of the investigation and its results to any person inside or outside of Mindtree.
- 7.21 Except for the Chief Ombudsman, no person is authorized to go to the media or any other external body. The Chief Ombudsman may do so in consultation with the management of Mindtree.

- 7.22 Mindtree's culture conforms to non-vindictive environment. Mindtree ensures every Whistle blower that he/she would not be jeopardized, terminated or retaliated against for reporting any Secured 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. Retaliation could be constructive discharge or dismissal from services, demotion, denying or delaying progression or salary increase or stock options.
- 7.23 Subsequent to the reporting of any Secured Disclosure and appeal as referred to under clause 7.18 and 7.19, 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 either of the following executives for investigation and appropriate remedial action: CEO & MD of Mindtree.
- 7.24 If a Respondent to the Secure Disclosure is a member of any investigative body engaged in the process of investigating and addressing complaints under this Clause 7, including and not limited to being a member of the Ethics and Compliance Committee, the Audit Committee or holding the designation of the Chief Ombudsmen, he/she must recuse himself/herself from the entire investigation process to allow a fair and impartial investigation into a Secured Disclosure.
- 7.25 The Whistleblowers Policy is applicable to all Mindtree Minds, Mindtree and all its subsidiary companies. The Ethics and Compliance Committee shall be guided by the legal department of Mindtree for ensuring that investigations into Secured Disclosures in geographies other than India are compliant with the appropriate country laws.
- 7.26 Where a Secured Disclosure is determined to be a compliant in the nature of Sexual Harassment against a Mindtree Mind (or any other person in connection with Mindtree's workplace), the Ethics and Compliance Committee will promptly forward the same to the POSH Committee for appropriate action in compliance with POSH Laws.
- 7.27 Where a Secured Disclosure is determined to be a compliant in relation to violation of the PIT Regulations, the PIT Code or the Fair Disclosure Code, the Ethics and Compliance Committee will promptly forward the same to the PIT Committee for appropriate action in compliance with the PIT Regulations.
- 7.28 In the event a Secured Disclosure by a Whistleblower relates purely to his/her performance

issue, appraisal rating, pay increase or a general personnel or administration issue which is considered by the Ethics and Compliance Committee further to investigation as not being the result of any action, behaviour or pressure from any case set out under clause 5.2, the Ethics and Compliance Committee may defer the disclosure to the human resources or administration department for resolution.

- 7.29 In the event a Secured Disclosure is required to be reported to a law enforcement agency such as police, Mindtree will provide necessary support and assistance to the Whistleblower and other witnesses including for giving evidence in a criminal proceedings.
- 7.30 The Ethics and Compliance Committee will prepare quarterly report giving statistical details of the Secured Disclosures received under the Whistleblower Policy, outcome of their investigation, matters pending for more than 30 days and a summary of key disclosures. This shall be placed before the Audit Committee. The Ethics and Compliance Committee will ensure implementation of recommendations, if any, made by the Audit Committee in respect of a specific disclosure or any other. The Ethics and Compliance Committee shall report to the Audit Committee the measures taken to implement recommendations, if any, made by the Audit Committee on the quarterly reports submitted by the Ethics and Compliance Committee All Secured Disclosures along with the results of investigation relating thereto, shall be retained by Mindtree for a period of 5 (five) years or such other period as specified by any other law in force, whichever is more.

8. AMENDMENT

Mindtree reserves its right to amendment or modify the Whistleblower Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Mindtree Minds unless the same is notified to them in writing (either by email or by internal communication).

Procedure for dealing with Complaints raised with respect to violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”), the Code of Conduct for Prevention of Insider Trading in the Securities of Mindtree Limited (“PIT Code”) and Code of Fair Practices & Disclosure (“Fair Disclosure Code”) by a whistleblower

Prevention of Insider Trading Committee (“PIT Committee”): Mindtree Limited (“Mindtree”) has constituted a PIT Committee to investigate complaints relating to the violation of the PIT Regulations, the PIT Code and the Fair Disclosure Code.

PIT Committee will comprise of the following:

1. Pradip Menon (Chairperson)
2. Erwan Carpentier (Member)
3. Anish Philip (Member)

Policies and procedures for conducting an inquiry by PIT Committee

- 1.1 A Whistleblower intending to make a Secured Disclosure against a Respondent must post the same in the Whistleblower section on People Hub (Available at <https://peoplehub.mindtree.com/sites/Policies/WandE/Pages/POSHPolicy.aspx?NewLocation=India>). The Whistleblower may also lodge his/her complaint by email to pradip.menon@mindtree.com or by courier addressed to Mindtree Limited, Prevention of Insider Trading Committee, Global Village, RVCE Post, Mysore Road, Bengaluru - 560 059, India. On submission of the Secured Disclosure, the PIT Committee will act on the Secured Disclosure. For the meaning of the terms ‘Whistleblower’, ‘Secured Disclosure’ and ‘Respondent’ refer to the Whistleblower Policy.
- 1.2 Whistleblower is expected to make a Secured Disclosure that is factual and not speculative and is not in the nature of a mere conjecture, surmise or rumour. It must be made in good faith for the purpose of seeking a redress and should contain as much specific information as is known to the Whistleblower at that point of time. The disclosure must be in as much detail as is possible by the Whistleblower.
- 1.3 The PIT Committee shall, where it deems necessary, conduct a formal investigation based on the information provided in the Secured Disclosure. The Respondent and the witnesses identified by the PIT Committee have the responsibility to cooperate with the PIT Committee in the

investigation by reporting all pertinent facts and concealing none. During the course of the investigation, the PIT Committee will always give the Respondent a fair opportunity of being heard in respect of the Secured Disclosure. PIT Committee will ensure whistle blower of confidentiality and protection from retaliation.

- 1.4 The PIT Committee may, at its sole discretion, involve other investigators such as personnel from the human resources, finance and accounts, administration, internal audit, chief information officer, legal or any other department of Mindtree that possesses specialized skills necessary for the purpose of investigation. Every department has a duty to support the PIT Committee. In certain critical situations the PIT Committee may hire the services of an external organization including a lawyer, law firm, chartered accounting firm and electronic discovery services.
- 1.5 The PIT Committee will not take any statement from a Respondent or a witness under duress or coercion.
- 1.6 Where the PIT Committee decides to conduct interviews, it shall not voice or video-record the interview without the prior written consent of the person being interviewed provided the same is permitted under the law. The person being interviewed cannot, in any circumstance, record the interview.
- 1.7 The Respondent, Whistleblower or a witness who is being interviewed cannot involve the services of an advocate or a third party in the investigation process or be present in the interview room.
- 1.8 The PIT Committee is vested with the responsibility of conducting a fair and impartial investigation into a Secured Disclosure. If at the conclusion of its investigation, PIT Committee determines that a violation has occurred, PIT Committee shall take effective remedial action commensurate with the nature of the offense. This action may include levying penalty or taking disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violations of Mindtree's internal policies.
- 1.9 If the Respondent to the Secured Disclosure is a member of the PIT Committee, the Respondent shall not be a part of the PIT Committee hearing the matter raised in the Secured Disclosure.
- 1.10 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.
- 1.11 The PIT Committee shall make a detailed written record of the Secured Disclosure (“**Report**”). The Report shall contain the following particulars:



- Facts pertaining to the concern or complaint;
 - Whether the same Secured Disclosure was raised previously by anyone, and if so, the outcome thereof;
 - Whether any Secured Disclosure was raised by the Whistleblower previously against the same Respondent or any other, and if so, the outcome thereof;
 - The financial/other loss which has been incurred/would have been incurred by Mindtree;
 - Findings of the PIT Committee; and
 - The recommendations of the PIT Committee on the levy of penalty or other disciplinary/other actions including a recommendation of a correction of process or amendment of a policy/code.
- 1.12 The PIT Committee shall complete its investigation within 45 working days from the date of receiving the Secured Disclosure. PIT Committee will provide a summary report of the investigations conducted based on Secured Disclosures and actions taken against Respondents if any, to the Audit Committee on a quarterly basis. If the Respondent to the Secured Disclosure is a member of the board of directors of Mindtree or its subsidiary companies, the PIT Committee will investigate the matter and place a Report before the Audit Committee for determination of the appropriate course of action in the matter. For the meaning of the terms ‘Audit Committee’ refer to the Whistleblower Policy.

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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. Visit www.mindtree.com to learn more.