

Business Responsibility Report

Committed to the National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business (NVG – SEERB), Mindtree reports on the nine principles of the guidelines as its Business Responsibility Report (BRR), in its annual report.

We also publish a comprehensive Sustainability Report annually.

Our Business Responsibility Report includes our responses to questions on our practices and performance on key principles defined by Regulation 34(2)(f) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015, covering topics across environment, governance, and stakeholder relationships. We have provided cross-references to the reported data within the main sections of this Annual Report for all aspects that are material to us and to our stakeholders.

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: Mindtree Ltd, Global Village, RVCE Post, Mysore Road, Bengaluru-560059, Karnataka, India
4. Website: www.mindtree.com
5. E-mail id: investors@mindtree.com
6. Financial Year reported: April 01, 2019 - March 31, 2020
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): The company provides services in the area of Application Development and Maintenance, Infrastructure Support, Data Analytics, Automation, Testing and Package Solutions.
9. Total number of locations where business activity is undertaken by the Company - Please refer to our website for details : <https://www.mindtree.com/about/locations>
10. Markets served by the Company – Local/State/National/ International: North America, Asia Pacific, Europe, Middle East, India

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

1. Paid up Capital (INR): 1,646 million
2. Total Turnover (INR): 77,643 million
3. Total profit after taxes (INR): 6,309 million

4. Total Spending on Corporate Social Responsibility (CSR) percentage of profit after tax (%): As disclosed in the Directors' Report- Annexure 6.
5. List of activities in which expenditure in 4 above has been incurred: A detailed table is disclosed in the Directors' Report- Annexure 6.

SECTION C: Other Details

1. Does the Company have any Subsidiary Company/ Companies?
The Company has 2 direct 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)

Our responsibility practices and reporting are focussed on India, our home ground. However, our subsidiaries share our vision and values and are responsible businesses.

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%]

We engage our suppliers in our vendor engagement forums from time to time, as part of our responsibility initiative, and our vendors are glad to participate in these forums and share feedback and suggestions for a mutually beneficial relationship.

SECTION D: BR Information

1. Details of Director/Directors responsible for BR
 - (a) Details of the Director/Directors responsible for implementation of the BR policy/policies
 1. DIN Number: 00823966
 2. Name: Debashis Chatterjee
 3. Designation : CEO & Managing Director
 - (b) Details of the BR head

No.	Particulars	Details
1	DIN Number (if applicable)	00823966
2	Name	Debashis Chatterjee
3	Designation	CEO & Managing Director
4	Telephone number	080-67064000
5	e-mail id	DC@mindtree.com

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

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

No.	Questions	P 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 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
	People policies including POSH, non-discrimination, 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.									
4	Has the policy being approved by the Board?	Y	Y	Y	Y	Y	Y		Y	Y
	Is yes, has it been signed by MD/ owner/ CEO/ appropriate Board Director?									
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		Y	Y

Website links to our policies:

Policy 1 : Whistle Blower Policy

<https://www.mindtree.com/sites/default/files/2019-12/mindtree-whistle-blower-policy.pdf>

Anti-Slavery and Anti-Human Trafficking Statement

<https://www.mindtree.com/sites/default/files/2020-04/modern-slavery-statement-mindtree.pdf>

Integrity Policy

<http://www.mindtree.com/code-conduct>

Policy 2 : Sustainability Policy

<http://www.mindtree.com/sites/default/files/mindtree-sustainability-policy.pdf>

Environmental Health & Safety Policy

https://www.mindtree.com/sites/default/files/2018-08/EHS-Policy-Aug2018_0.pdf

Policy 3 : Equal Opportunity Policy

<https://www.mindtree.com/sites/default/files/2017-12/Equal%20Opportunity%20Policy%20New.pdf>

Policy 4 : Equal Opportunity Policy

<https://www.mindtree.com/sites/default/files/2017-12/Equal%20Opportunity%20Policy%20New.pdf>

Also, Reasonable Accommodation policy (internally published)

Policy 5 : Equal Opportunity policy

<https://www.mindtree.com/sites/default/files/2017-12/Equal%20Opportunity%20Policy%20New.pdf>

Policy 6 : Environmental Health & Safety Policy

https://www.mindtree.com/sites/default/files/2018-08/EHS-Policy-Aug2018_0.pdf

Policy 7 : There is no distinct policy on public advocacy. Please refer to the details given under Principle 7 of this Report for details of our advocacy and outreach engagements.

Policy 8 : Corporate Social Responsibility Policy

<https://www.mindtree.com/about/investors/policies/policy-corporate-social-responsibility>

Policy 9 : Code of Conduct

<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 1	P 2	P 3	P 4	P 5	P 6	P 7	P 8	P 9
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 Principle 7 of this 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?

The CSR Committee has met in the time frame of 3-6 months during the FY 2019-20. Three meetings were held during the FY 2019-20.

- (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 a part of our annual report . We publish Sustainability report every year.

<https://www.mindtree.com/about/sustainability>

incorporated social or environmental concerns, risks and/or opportunities.

- Being a software solutions Company, our products and services do not involve ESG risks. Our commitment to the precautionary principle keeps us vigilant on our processes and operations regarding energy, emissions water and waste management, and our CDP report is a testimony to our efforts. Our Mindtree Foundation is engaged in numerous community engagement initiatives. Our CSR platforms are focussed on leveraging technology for addressing social and environmental risks in the larger society and creating sustainable value over years.

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 on product-basis. (However, our achievements in operational resource conservation and overall climate change risk mitigation efforts are shared in our CDP report and our sustainability report.)

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.

- Mindtree is a strong believer in local sourcing when it comes to talent and materials. Local hiring is a norm across Mindtree. Our local hiring at outside India locations also has increased over the years. Procurement of materials from local sources is a smart strategy we have been following for years, since it reduces time, cost and efforts in procurement, apart from being responsible to the growth of supply base around our locations. Our sustainability report shares the details of our performance on local hiring and sourcing.

SECTION E: PRINCIPLE-WISE PERFORMANCE

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

- 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?
 - Mindtree is a strong endorser of ethics and has stringent, 'zero tolerance' stance towards lack of integrity. Our integrity policy is all pervasive, across locations and units, with our training on integrity covering all our people and contractors. Our suppliers are bound by our code of conduct. Our business partners and NGO partners are aligned to our ethical values.
- 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.
 - All the 118 complaints received from shareholders were resolved during the year
 - 46 grievances received from employees, 43 were resolved, with 3 cases pending redressal.

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

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?
 - Minorities and women entrepreneurs do have a place of attention in our procurement practice. They form an important segment of our supply base. We are in the process of establishing the capacity enhancement measures for this segment.
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 principle takes not only systemic structures and capacity but also advocacy and awareness. Our investments in recycling have gone a long way in resource conservation, and our recycling efficiencies have always been high. Our advocacy and awareness campaigns have also worked hard towards decreasing generation of waste in the first place. Our people have enthusiastically spearheaded waste management efforts, details are made available in our sustainability report. Also refer to our Integrated Reporting for more details.

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

1. Please indicate the Total number of employees: 21,991
2. Please indicate the Total number of employees hired on temporary/contractual/casual basis: 1,676
3. Please indicate the Number of permanent women employees: 7,124
4. Please indicate the Number of permanent employees with disabilities: 45
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.

Category	No of complaints filed during the financial year	No of complaints pending as on end of the financial year
Sexual harassment	5	Nil

There have been no complaints relating to child labor, forced labor, involuntary labor during the year.

8. What percentage of your under mentioned employees were given safety & skill upgradation training in the last year?
 - (a) Permanent Employees: 76.01%

- (b) Permanent Women Employees: 81.93%
- (c) Casual/Temporary/Contractual Employees: 13.24%
- (d) Employees with Disabilities: 60%

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 endeavours focus attention towards the disadvantaged, vulnerable and marginalised stakeholders. Our Mindtree Foundation spreads its initiatives across education for the under privileged, support for people with disabilities, and empowering the women and youth of the country. Please refer to our website, the Directors' report of our annual report and our sustainability report for the details.

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?
 - We endorse the importance of human rights at all levels at all times. Mindtree has been envisaged and designed from the beginning as a humane organisation, and we insist it reflects in our conduct at all levels. Our operations, functions, people, contractors, supply chain partners are all a part of our philosophy 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?
 - Our stakeholder engagement processes are robust and have strong listening mechanisms. Additionally, all stakeholders have access to the Whistleblower Policy. 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 all our people- permanent and contractual employees and Vendors.
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.

- As a responsible company, Mindtree is committed to addressing climate change risks in proactive ways and modes. We endorse the precautionary principle towards global warming and climate change, and take up various committed initiatives towards resource conservation and preservation. Our initiatives for energy, water conservation and waste recycling have seen increasing efficiencies over the years. Our CDP and Sustainability reports detail out our efforts in this direction.
3. Does the company identify and assess potential environmental risks? Y/N
 - Mindtree believes protecting the environment is the responsibility of every Mindtree Mind. In addition, individual Function Heads own environmental risk management within their sphere of operations. Oversight of significant risks identified is provided by the Mindtree Enterprise Risk Management (ERM) team.
 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 in our Sustainability Report.
 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 are 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) 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)
 - Inclusive development policies, sustainable business principles, workplace engagement, diversity, women-

friendly practices, and anti-sexual harassment mechanisms form some of the themes our leadership has taken up for public policy and advocacy. Knowledge and innovation also form the themes of leadership engagement, owing to the relevance of these themes in today's times and Mindtree's forte in new age technology and innovation.

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 6 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?
 - Our CSR policy that guides our inclusion philosophy is operationalized through our inclusion programmes conducted by our Mindtree Foundation. Various NGOs support the work of the Mindtree Foundation, lending us their special expertise, local infrastructure and execution capabilities. External partners form an important component in the execution of such initiatives.
3. Have you done any impact assessment of your initiative?
 - We are connected to the ground level realities of our inclusion projects in a direct way, with involvement of our leaders and management at personal levels, and we constantly assess, monitor and capture feedback both in formal and informal ways. The effectiveness index which the Mindtree Foundation employs measures the effectiveness of all its programmes. During the year detailed impact assessment by an external agency has been carried out. The impact assessment outcome results were highly satisfactory.
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 6, 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 inclusion initiatives are conceived as sustainable projects, with a long term view in mind. Neither sporadic in our contributions, nor adhoc in our compassion, we are believers in transformation of the long term kind, and hence plan our interventions in an integrated manner, often linking out themes with one another. Our direct connect with beneficiaries at the grass root, and our integrated approach has not only ensured sustained impacts for the beneficiaries but has also won their hearts to make them and their families participate in the efforts towards change. Thus, our social change projects become sustainable from the beneficiaries' end as well.

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, as Mindtree is a software services 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?
 - Customer Satisfaction is the primary Business Objective of Mindtree. To ensure completeness of understanding customer's experience of our services, Mindtree has two levels of feedback surveys – Customer Experience Survey (CES) and Project Feedback Survey (PFS) .The annual Customer Experience Survey (CES) aims at understanding customer's perception at account management and engagement practices administering CES to our customer organizations' CXO and Senior-level contacts. The quarterly Project Feedback Survey (PFS) aims at understanding customer's satisfaction with Mindtree project execution and delivery practices. We administer PFS to our customer organizations' Mid-level contacts who have day-to-day interaction with our project teams. The project and account teams analyze the results from the surveys and take appropriate actions to improve the feedback