

## **UNGC Communication on Progress Report**

**Tech Mahindra represents the connected world, offering innovative and customer centric information technology experiences, enabling Enterprises, Associates and the Society to Rise™. It is a USD 5.2 billion company with 1,25,000 + professionals across 90+ countries, helping over 973 global customers including Fortune 500 companies. The company's convergent, digital, design experiences, innovation platforms and reusable assets connect across several technologies to deliver tangible business value and experiences to its stakeholders. We are part of the USD 21 billion Mahindra Group that employs more than 250,000 people in over 100 countries. The Group operates in the key industries that drive economic growth, enjoying a leadership position in tractors, utility vehicles, after-market, information technology and vacation ownership.**

**The Company offers a bouquet of services which includes IT Outsourcing Services, Consulting, Next Generation Solutions, Application Outsourcing, Network Services, Infrastructure Management Services, Integrated Engineering Solutions, BPO, Platform Solutions and Mobile Value-Added Services. The Company's innovation platforms and reusable assets connect several technologies to deliver tangible business value to its stakeholders. We are well placed with our breadth of service offerings in emerging areas of Big Data, Mobility, Network, Cloud, Security, Platforms and Engineering Services. We constantly innovate, building intellectual property through various services and platforms to help our customer transform. Tech Mahindra is committed to pursuing plans that will create long-term value for all the stakeholders and believe that business profitability can be achieved by being strategically effective across all levers of sustainability – environmental, social, economic, and governance.**

**TechM has a comprehensive environmental strategy and policies for the reduction of GHG emissions, use of water and waste generation. We have taken SBTi-approved emission targets & implemented internal Carbon Price to boost green investments. Our focus areas of environmental sustainability include transitioning towards low emission technology, increasing renewable energy mix, water stewardship, responsible waste management, air quality management, circular economy and promoting biodiversity.**

**Tech Mahindra follows human rights and fair employment practices based on existing international standards like UN Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, ILO Declaration on Fundamental Rights at Work, and UN Convention on the Rights of the Child. Our due diligence process covers all aspects under the UNGC principles. We have a Global Compliance Framework Functional Manual which identify and comply with applicable HR and compliance regulations. We aim to equip our employees with simple and efficient means to be compliant and fully integrate risk management in daily activities**

**Resilience and commitment to serve the beneficiaries are the fundamental aspects that the social agenda of Tech Mahindra. These virtues help us stay committed to making our stakeholders feel socio-economically and psychologically empowered.**

**We made major strides in our journey of automation and were able to deliver higher volume despite only a small change in total headcount. Cash conversion remains a key focus area as evident from our ability to generate free cash flow in-line with last year. We remain committed to returning capital to our shareholders and providing enhanced returns to investors through a prudent mix of dividends and share buybacks.**

**We have established committees/processes like the Ombudsman process, Prevention of Sexual Harassment Committee, Risk committees, and a Diversity Council to review progress and formulate strategies to address issues on compliance, safety and a harassment-free workplace. Our internal review mechanisms are designed to identify any risk of Human Rights violations or gaps in any of our own operations and in the supply chain. We are cognizant of the risk that Bribery and Corruption can pose to the organisation's integrity and culture. Our Anti-corruption and Bribery Policy help us maintain the required checks and balances to ensure an ethical workforce. We have Zero tolerance to sexual harassment at the workplace. Tech Mahindra is one of the trusted peers in the industry upholding the human rights. It is one of the most sought-after organization amongst the candidates and employees and trusted amongst the clients and customers**

**Tech Mahindra is committed to proactively address water sustainability issues by implementing the Water Policy, which serves as a directive for establishing Water Management strategies, systems, processes, practices and research initiatives. Tech Mahindra has implemented Water Policy which has Water Management strategies in order to comply with legal requirements, minimize its water footprint, maintain desired water quality during processes and discharges. We have tied up with various NGO's to conduct Green initiatives and water water-saving programmes.**

**We have identified material issues and aligned them with our roadmap and targets, policies and procedures, and our strategy to create value for our stakeholders and mitigate any risks. For details on Roadmap and achievements please refer on page 53-56 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>.**

**How is the accuracy and completeness of information in your COP assessed by a credible third-party? The COP incorporates the following high standards of transparency and disclosure:**

**Our UNGC CoP response is part of our Integrated Report 2020 which is available online at our websites and distributed to all our stakeholders is assured by third party KPMG according to Limited Assurance requirements of International Federation of Accountants' (IFAC) International Standard on Assurance Engagement (ISAE) 3000 (Revised), and on page 14 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>. Our CEO**

supports UNGC's Women's Empowerment Principles and advancing equality. Our IR 2020 is according to IIRC framework, comprehensive GRI standards, and TCFD and CDSB framework. During the next CoP our IR we plan to align our IR with SASB also.

The CSR committee of the Board is the apex body responsible for oversight and decision making on economic, environmental and social aspects of Sustainability and CSR across the organisation. The Committee is the final authority for review, prioritisation of material matters and decision making on CSR and Sustainability, including climate change. The Risk Management Committee of the Board monitor assess and review climate and sustainability risks in alignment with TCFD recommendations. The Managing Director & CEO of the company is the chair of the CSR Committee and is responsible for the integration of sustainability and climate risks and opportunities into the overall corporate strategy. He reviews Sustainability performance, progress and implementation of Sustainability policies and initiatives and briefs the committee on Sustainability and climate-related agenda. the Chief Sustainability Officer (CSO), is responsible for overall implementation of climate change and sustainability strategy and initiatives; developing budgets and plans for sustainability and climate change. He communicates the sustainability agenda to every function in the organisation and is ably supported by his team of sustainability managers and sustainability champions in implementing the same across the Company. The CSO also helps in climate related risk management and is involved in benchmarking the company, considering all external factors, indices and peer-to-peer best practices.

The COP incorporates the following high standards of transparency and disclosure and with respect to your company's actions to advance the Sustainable Development Goals (SDGs):

The Sustainable Development Goals (SDGs) are a universal call for action to end poverty, protect the planet and ensure that all people enjoy peace and prosperity by 2030. The SDGs represent an opportunity for sustainable business growth, promoting new opportunities and partnerships while contributing to societal development and environmental protection. For more details on SDG's, its impacts and opportunities, please refer on page 17-19 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>. Strategy:

**Criterion 1: The COP describes mainstreaming into corporate functions and business units**

**Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts.**

Various corporate function and capitals work in synergy to maximize performance and avoid negative impacts adding value to our stakeholders. Reskilling, utilization of employees by HR function will increase productivity which will increase financial performance and minimize negative impacts of attrition. Our Sustainability goals

and commitment enables us to procure efficient products and adopt practices to optimize resource which will reduce operational cost and increase financial costs which will avoid emissions and its negative impacts on environment.

Environmentally and socially sustainable facility and infrastructure management will reduce operational cost and help in employee engagement which will improve financial performance of company. This will reduce adverse effects of climate and social risks.

Design corporate sustainability strategy to leverage synergies between and among issue areas and to deal adequately with trade-offs

Tech Mahindra has integrated sustainability with its business strategy. We believe that ESG principles built into our long-term growth strategy help mitigate risks and drives profitable growth by investing in sustainable innovations that positively impact the world. Our commitment to environmental sustainability, climate change, and water security spans our entire business and we are pursuing plans that will have long-term impacts on the planet and communities, leading to synergy between sustainability and overall business profitability. We aim to reduce our carbon footprint by increasing our renewable energy consumption, installing solar modules, LEDs, fitting motion sensors, using star-rated and efficient equipment, and reducing, recycling, and reusing waste which will trade-off our capital cost with operational cost in the long run. We aim to decrease transport emissions by using improved logistics policies and inventory control measures. We have digitalized internal communications with virtual meetings through tele/ audio-conferencing that bring down meeting- related travel considerably. We ensure compliance with applicable environmental regulation in the areas we operate and go beyond to fulfil our corporate responsibility. Our People Policy states that "We will create the best human experiences for our associates (employees) with a healthy and inclusive environment; ensuring our associates are future ready; fostering innovation with meaningful work; drive performance orientation for individual and organisation growth, while celebrating each moment." We are cognizant of the impact of a deteriorating natural capital on the financial capital, social capital, and manufactured capital. For example, climate change-induced events pose a direct risk to all the 6 capitals. Any environmental/social situation at any of the locations we operate in can adversely impact our business. It can disrupt service delivery to our customers and jeopardize the safety of the associates, thereby increasing our overall financial liability. We embrace a proactive and precautionary approach towards environmental protection and management and endeavour to create a healthy, safe, pollution-free, and green enterprise.

Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary

The Chief Sustainability Officer (CSO), is responsible for overall implementation of climate change and sustainability strategy and initiatives; developing budgets and plans for sustainability and climate change. He reports to the Managing Director & CEO. He communicates the sustainability agenda to every function in the

organisation and is ably supported by his team of sustainability managers and sustainability champions in implementing the same across the Company. Each location of operations has Sustainability Champions from different departments who are responsible for implementation of the sustainability agenda at the location and facility level. They are responsible for implementation, monitoring and environmental compliance. The implementation of the organisation wide sustainability initiatives and campaigns are given wings by the Green Marshals. Our efforts are driven by the Green Marshals - a small band of TechMighties who are passionate about spearheading the cause of environmental sustainability. Green Marshal across geographies enables us to create a platform for the associates to engage in co-curricular and societal activities driven towards environmental stewardship and carbon responsibility. The Green Marshals consistently devise methods to motivate Employees for Green activities by Making Sustainability Personal. For more details on initiatives please refer on page 174-175 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>

**Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy**

Tech Mahindra has integrated sustainability with its business strategy. We believe that ESG principles built into our long-term growth strategy help mitigate risks and drives profitable growth by investing in sustainable innovations that positively impact the world. Our commitment to environmental sustainability, climate change, and water security spans our entire business and we are pursuing plans that will have long-term impacts on the planet and communities, leading to a balance between sustainability and overall business profitability. Sustainability Champions are responsible to drive the sustainability agenda within the company. Incentives are given for their ideas and initiatives which help bring in reduction in energy, emissions, water or improve our sustainability awareness and goals across the organisation. These incentives and awards are given to the employees of all Business functions on a quarterly & annual basis by Senior Leadership & Location Council members at each location. The KUDOS recognition program provides gift vouchers that can be used at various e-commerce websites. We provide recognition which includes 1. Pat on the back award 2. Certificates of appreciation 3. Associate/ Team of the month/ year awards 4. ACE award 5. Star award 6. Peer recognition award 7. Sustainability Champion award

**Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc) ensuring that no function is conflicting with company sustainability commitments and objectives**

**Our 6-pillar strategy by innovation team includes:**

- 1) IRIS (Ideate, Refine, Implement, Shine)
- 2) fund and assist our Associates who have an idea and the expertise to convert it into a business reality.

- 3) focus on drawing and comprehending innovative ideas at work in the start-up ecosystem to create future opportunities to serve our customers.
- 4) identify innovative solutions developed and implemented within verticals and to encourage cross-pollination of solutions across all verticals. This not only avoids duplication but also helps us to rapidly scale innovations, enhance their impact, and build capacity to address more challenges.
- 5) engage with educational institutes to develop new service offerings and create an innovation culture and deployment of incubation frameworks in colleges
- 6) manages Patents, Copyright and Trademark related services for the entire organisation

Our facility and infrastructure management team help us in placing orders to procure products which are suitable and having optimum capacity and cost. Vendor management and purchase is done by Procurement team in coordination with Legal team for contracts considering all Sustainability factors in line with Sustainability strategy. Finance function helps to negotiate rate and procure right product which are financially viable. HR function helps in people management for smooth functioning of operations and process.

#### **Criterion 2: The COP describes value chain implementation**

**Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners**

Tech Mahindra's commitment to Governance, Ethical Business Conduct, Environmental Stewardship and Sustainability also extends to our value chain. This enables us to mitigate and manage risks posed by the supply chain to our business operations. We engage with our suppliers and business partners annually and support them in building their capabilities on sustainable practices and business ethics. We enable supply chain responsibility through a 3-step process which included supplier audit (both questionnaire-based as well as on-site inspections) and assessment, supplier capacity building and supplier continuous improvement programmes and climate risk evaluation. Capacity building workshops are conducted annually for the suppliers. The objective of the Capacity Building Workshop is to help suppliers understand the importance of sustainable development and to create a platform for all stakeholders to discuss their concerns and challenges. In the reporting year, we have conducted Capacity Building Workshops for more than 80 key suppliers. The main topics covered in the capacity building workshop included:

☐ Environmental Stewardship ☐ Conservation of Resources ☐ Reduction of Carbon Footprint ☐ Financial Savings and Viability ☐ Social Responsibility

**Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence**

**Tech Mahindra have a Sustainable Supply Chain Management Policy (SSCM) which lays out guidelines for the Supplier Code of Conduct (SCOC). All suppliers are expected to abide by the SSCM Policy and the SCOC while demonstrating a commitment to incorporating best practices and continuous improvement in their activities and processes. We conduct supplier audits, which help us understand the potential ESG (Environmental, Social and Governance) risks within the Supply Chain. We encourage our suppliers to track and reduce their GHG emissions. In the reporting year, we engaged with the top 80 suppliers based on our annual market spend. They were assessed through a supply chain questionnaire, check compliances with various aspects of ethical business conduct and sustainability practices laid out in our SSCM Policy. Stratified samples of these suppliers representing different locations, categories of suppliers and the total annual spending were chosen for on-site audits. The key mandate during the audit is on compliance and measures taken to account for and to reduce GHG emissions. The observations, findings, and recommendations of the audit are shared with the suppliers audited to drive continuous improvement programmes. For details please refer on page 191-193 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>**

**Analyze each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts**

**Our commitment to climate action is also extended to the supply chain. We periodically evaluate the impact of climate change in the upstream and downstream supply chain on our business operations and activities. We carry out a comprehensive risk analysis of our supply chain on their ability to deliver on time because of the market and climate-related risks. We track the Scope 3 emissions from transportation and distribution of products purchased from our suppliers and operations of vehicles not owned or operated by us are tracked. This includes multi-modal shipping where multiple carriers are involved in the delivery of a product. We are engaging with our suppliers to initiate the process of tracking, monitoring, reviewing and analysis of the GHG emissions of the supply chain. The Value Chain risk management for Tech M refers to dealing with risks across the stages of value chain, which include natural disasters, employee strikes, sanctions, fires or insolvencies—the causes of supply disruption are numerous. Globalization is making supply chains susceptible to disruption. To tackle the risks across the stages of value chain, we have employed a comprehensive value chain risk management program, which helps company secure supplier relationships, prevent bottlenecks & ensure that company is operating legally. To identify the risks at each stage of value chain we defined our value chain into: Inbound Logistics (Upstream), Operations, Outbound Logistics (Downstream), Marketing & Sales, Services. Identified risks & opportunities are assessed, evaluated & graded based on likely outcomes, probability of occurrence & magnitude of impact.**

**Criterion 3: The COP describes robust commitments, strategies or policies in the area of human right**

**Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services (BRE 1)**

**Tech Mahindra is committed to protect and respect Human Rights and remedying human rights violations in case they are identified. We provide equal employment opportunity, ensure fairness, create a harassment-free, safe environment and respect the fundamental rights. Our policies and procedures ensure prevention of human right violations like employment of child labour, forced/compulsory labour promoting health, safety and wellbeing, and freedom of association for the employees, and across the supply chain. There is no discrimination based on caste, gender etc. within the company and we focus on remedying human rights violations in case they are identified and best practices reflect specific reporting elements of the latter guidance, either Basic (numbers starting with BRE) or Advanced (numbers starting with ARE).**

**Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights) (BRE1 + ARE1):**

**We uphold our commitment to human rights as a member of the United Nations Global Compact wherever we operate. We are committed to exhibit zero tolerance towards all facets of modern slavery, as elaborated under the Modern Slavery Act, 2015 UK and Commonwealth Modern Slavery Act, 2018, Australia guided by the UN Declaration of Human Rights and the conventions of the International Labour Organisations specified to forced or compulsory labour. Please find our Human Right policy at <https://cache.techmahindra.com/static/img/pdf/Humanrights-Policy.pdf>. This policy applies to:**

- (i) Both executive and non-executive Directors of the company**
- (ii) All Associates of the company on permanent and contract role.**
- (iii) Suppliers, subsidiaries, distributors, business contacts, agents, advisors, business associates current and potential clients, customers and others acting on the Company's behalf.**
- (iv) (iv) While dealing with government, public bodies and non-profit organizations including their advisors, representatives, officials, politicians and political parties Tech Mahindra communicates all necessary and relevant information with regards to organizational finances, policies and long term growth with associates. They are also made aware of related laws, guidelines and applicable policies when they join the organization and given periodic reminders during their time in employment.**



**Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company (BRE 1 + BRE5 + ARE 1 + ARE 5) and Allocation of responsibilities and accountability for addressing human rights impacts:**

**Tech Mahindra ensure that there is a statement expressing our commitment to uphold human rights and ensure that there is no violation of human rights.**

**Tech Mahindra's Human Rights Policy is overseen by Board of Directors, including the Chief Executive Officer. We have established committees/processes like the Ombudsman process, Prevention of Sexual Harassment Committee, Risk committees, and a Diversity Council to review progress and formulate strategies to address issues on compliance, safety and a harassment-free workplace. Our internal review mechanisms are designed to identify any risk of Human Rights violations or gaps in any of our own operations and in the supply chain. Our philanthropic arm, Tech Mahindra Foundation is involved in several programmes to uplift underprivileged members of society providing education, employability, disability aid and green initiatives. Tech Mahindra follows human rights and fair employment practices based on existing international standards like UN Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, ILO Declaration on Fundamental Rights at Work, and UN Convention on the Rights of the Child.**

**At Tech Mahindra internal and external programs are reviewed through the policies on an annual basis to ensure they are up to date and in compliance with international labour standards. Any observations during audit or any suggestions from the employees and the employee representatives, and any change in the law, alignment of the best practice in the industry is considered while bringing the relevance of the human rights.**

**In some countries, local laws impose additional obligations on TechM regarding compliance with Human Trafficking, Forced Labor and Child Labor laws which may include, among other things implementing certain measures (e.g., compliance plans, specific clauses in agreements with third parties, annual certifications, statements, etc.) when entering into contracts with or in support of governments; making disclosures to the government that Human Trafficking, Forced Labor and Child Labor are not occurring at TechM or within TechM's supply chain, and reporting activity to the government that is inconsistent with these laws.**

**Criterion 4: The COP describes effective management systems to integrate the human rights principles.**

**Internal decision-making, budget and oversight for effective responses to human rights impacts and On-going due diligence process that includes an assessment of actual and potential human rights impacts (BRE 2 + BRE 3 + ARE 2 + ARE 3) and Process to ensure that internationally recognized human rights are respected:**

**TechMahindra follows human rights and fair employment practices based on existing international standards like UN Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, ILO Declaration on Fundamental Rights at Work, and UN Convention on the Rights of the Child. Our due diligence process covers all aspects under the UNGC principles. We have a Global Compliance Framework Functional Manual which identify and comply with applicable HR and compliance regulations. We aim to equip our employees with simple and efficient means to be compliant and fully integrate risk management in daily activities. Respect for Human rights is a fundamental value of Tech Mahindra Ltd. We strive to respect and promote human rights across all our global sites, in accordance with the UN Guiding Principles (UNG) on Business and Human Rights in our relationships with our employees and suppliers. TechM is committed to upholding of human rights within the communities we operate along with maintaining and improving systems and processes to avoid complicity in human right violations. We conduct due diligence as a means to identify and prevent human rights risks to people in our business and value chain. We are committed to provide for or cooperate in, their fair and equitable remediation if any violations are caused by Tech Mahindra's business activities, or through our relationships with third parties. Tech Mahindra's Human Rights Policy is overseen by Board of Directors, including the Chief Executive Officer.**

**Processes to provide for or cooperate in the remediation of adverse human rights impacts that the company has caused or contributed to (BRE 3+ BRE 4 + ARE3 + ARE 4) and Operational-level grievance mechanisms for those potentially impacted by the company's activities (BRE 4 + ARE 4)**

**The Tech Mahindra Whistleblower Policy is a critical means through which Stakeholders can raise actual or suspected violations towards remediation of Human Right impacts. Whistleblower policy provides Associates (whether permanent or on contract) Investors, customers, vendors and other stakeholders (hereinafter collectively referred to as stakeholders) an avenue to raise concerns, in line with the commitment of Tech Mahindra to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication. For process of Grievance mechanism through Whistleblower, please refer on page 4-5 at [https://cache.techmahindra.com/cache/investors/WhistleBlower\\_Policy.pdf](https://cache.techmahindra.com/cache/investors/WhistleBlower_Policy.pdf).**

**We also have a robust grievance handling mechanism in place to address any issue that might occur during any moment during an associates' life cycle at Tech Mahindra. The CARE (Connect with Employee and Resolve with Engagement) platform gives employees the chance to raise interpersonal issues like bullying and harassment. The Whistleblower Policy encourages employees to report non-compliance with relative anonymity. Carrying this forward, we have a platform called Free Voice where associates can share observations, complaints and suggestions anonymously, which has led to several improvements in our policies and practices. We ran a "Speak-up" campaign with a creative play on our technology background to encourage Associates to voice their ideas, suggestions and concerns on any of our listening forums like FreeVoice, the Corporate Ombudsman or the**

**POSH committee. Through the detailed policies, myriad platforms and inspirational Code of Conduct we are encouraging our employees make their voices heard to Leaders who are always listening**

**We are committed to conduct and govern ourselves with ethics, transparency and accountability, and for this purpose we have developed governance structures, practices and procedures that ensure ethical conduct at all levels. At Tech Mahindra, we ensure that the work environment at all our locations is conducive to fair, safe and harmonious relations, based on mutual trust and respect, among all Associates in the organization.**

**The Directors and Associates are required to conduct their duties legally, honestly and ethically while acting for and on behalf of Tech Mahindra or in connection with its business or operations. They shall:**

- ? Act in the best interests of, and fulfil their fiduciary duties to the stakeholders of the company;**
- ? Act honestly, fairly, ethically, with integrity and loyalty;**
- ? Conduct themselves in a professional, courteous and respectful manner;**
- ? Act in good faith, with responsibility, due care, competence, diligence and independence;**
- ? Act in a manner to enhance and maintain the reputation of the company;**
- ? Treat their colleagues with dignity and shall not harass any of them in any manner.**

#### **MAINTAINING AN EQUITABLE AND SAFE WORKPLACE - EMPLOYMENT PRACTICES:**

**The policy of the Company is to provide equal opportunities to all its Associates without being biased to their race, region, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability. The company has a policy to eliminate overt and covert bias in recruiting, promoting and separating male and female Associates. The company strives to hire people on the basis of their qualifications, prior experience, expertise and abilities, local and constitutional law mandate with regard to recruitment (if any) and is determined to provide a work environment free of any form of unlawful discrimination. The company shall promote gender equality in providing access to opportunities for training, learning, and participation in decision making. The company shall put in place organizational policies and practices that address various Associate issues including sexual harassment, work life imbalance and professional discrimination.**

**Any Associate with questions or concerns regarding any act of discrimination in the workplace is encouraged to bring the issue to the attention of his / her immediate supervisor or the head of the concerned business / support unit and further to the CORPORATE OMBUDSMAN.**

**At Tech Mahindra we have a clear communication to the employees, business partner and third parties in the form of a formal agreement. Employee engagement is clearly defined in employment contract, associate handbooks, policies, and procedures**

**Tech Mahindra (TechM)'s training program for Code of Ethical Business and Conduct (CEBC) comprising of Human rights and Sexual Harassment is intended to give associates the understanding and awareness required to carry out their responsibilities in compliance with legislation and regulations. CEBC assessment is mandatory. All associates are required to clear an assessment test within 30 days of commencement of their employment and whenever considered necessary (for example after significant changes to content).**

**Key elements for addressing modern slavery are:**

**1. Policy and due diligence**

**We expect our employees and suppliers to meet the provisions set out by us in our policy for Code of Ethical Business Conduct ("CEBC") and Diversity and Inclusion (D&I). Our Anti-Slavery policy has been captured in the Diversity and Inclusion Policy, which reflects our intention to ensure effective implementation of human integrity and complete eradication of slavery and human trafficking. To ensure complete compliance, we provide the CEBC Training, as detailed below, to all associates to increase awareness.**

**We, at Tech Mahindra, have an extensive training program for Code of Ethical Business and Conduct (CEBC) which covers various topics including modern-day slavery. Every individual employee of Tech Mahindra is required to undergo this training program. Awareness campaigns are conducted throughout the organization for all associates. Policy is available on intranet for reference. All associates are required to complete training and certify that they have read, understood and comply with all aspects of the Policy. Reporting Managers are responsible for ensuring that associates who report to them, directly or indirectly, comply with this Policy and complete certification and training required of them.**

**2. Risk assessment**

**To ensure removal of any instances of slavery, we have regular audits within Tech Mahindra, conducted by the internal audit team. These audits aim at improving our understanding of where the risks are greatest and prioritizing our activity accordingly.**

**Tech Mahindra being law abiding organization, strictly adheres to and complies with all employment related laws, including laws related to working hours, wages, welfare and human rights. All employees related policies of Tech Mahindra are transparent and available for viewing to all our employees. We continually update and amend our policies to align it with global best practices and changes in relevant laws.**

**Tech Mahindra has multi-layer reporting structure for each employee and have processes of 360degree feedbacks and employee satisfaction surveys (“ESAT”). Thus, every employee is able to give feedback on his/ her Reporting Managers, respective department/ function, and organization as a whole. These feedbacks are taken on annual basis and are shared with department/ function heads to be further disseminated. Departments/ functions are also rated on the basis of such 360° feedbacks and ESAT.**

**All employees’ performances are appraised in transparent manner and on at-par basis. Employees are given opportunities to grow in their respective professions/ occupations.**

**Tech Mahindra undertakes several employee benefit and welfare initiatives like health awareness, entertainment etc. in order to ensure that employees work in conducive and exploitation-free environment.**

**In above manner, Tech Mahindra has ensured that there is no scope for any instance of slavery, servitude or human trafficking.**

### **3. Awareness and collaboration**

**We have developed internal programs to raise awareness of issues such as slavery, forced or compulsory labour, exploitative practices by labour providers and human trafficking. We also have effective policies in place which ensure that no young person below the legal age is hired by Tech Mahindra for any work.**

### **4. Building a strong supply chain**

**We require our suppliers to ensure they work in alignment with applicable policies, laws and also our values. We expect our suppliers to comply with all applicable regulations and legislation relating to working hours, wages, welfare, human rights. We make available to the suppliers, our policies such as Code of Ethical business conduct, which are implemented to lay foundation for strong corporate governance.**

**All our suppliers are expected to work in accordance with our ethos and approach with regards to health, safety, environmental and people development objectives. In this regard, we believe in supporting our suppliers through training and knowledge-sharing and hold regular forums to communicate clear expectations.**

### **5. Corporate governance framework**

**We operate within an established and externally benchmarked corporate governance framework that is underpinned by our vision and values. A key function of our corporate governance framework is the identification, management and mitigation of risks meted out to the associates under the current working environment of Tech Mahindra. Tech Mahindra is dedicated to creating a fair and transparent work environment with mutual respect for all.**

**The CORPORATE OMBUDSMAN is primarily responsible for overseeing and managing compliance issues within the organization. The Corporate Ombudsman is in charge of ensuring, that the company and its Associates are complying with internal policies and procedures.**

**An associate can raise a concern with the Corporate Ombudsman by sending an e-mail or in person. Complaints can also be reported verbally on telephone. Verbal reports will normally be documented by the Corporate Ombudsman by a written transcription of the verbal report.**

**Business must play its part. However, combatting modern slavery effectively requires improved traceability, increased transparency and collaboration between statutory agencies, civil society organizations and the private sector.**

**Internal awareness-raising and training on human rights for management and employees: At Tech Mahindra there is an awareness and certification program on the code of conduct which highlights the importance of human rights aspects. Over and above this awareness program, Tech Mahindra periodically conducts townhouse, open house, fire chat session with CEO, coffee with CEO, as well as posters, screensavers and mailers.**

**Tech Mahindra's training Program for Code of Ethical Business and Conduct (CEBC) and Policy on Prevention of Sexual Harassment is intended to give associates the understanding and awareness required to carry out their responsibilities in compliance with legislation and regulations.**

**All associates are required to complete training and mandates as assigned acknowledging that they have read, understood and comply with CEBC Policy. Reporting Managers are responsible for ensuring that associates who report to them, directly or indirectly, comply with this policy and complete certification and training required of them.**

**All associates are required to clear an assessment test within 30 days of commencement of their employment and whenever considered necessary (for example after significant changes to content). Associate will receive communication about the mandate along with instructions and deadlines Action in the event of non-completion of mandatory certification: -**

<b>Timelines</b>	<b>Action</b>
<b>1. Beyond 30 days</b>	<b>E-mail warning</b>
<b>2. Beyond 60 days</b>	<b>Warning letter + InCit record in Ide@s</b>
<b>3. Beyond 90 days</b>	<b>De-allocation from project / assignment (POSH) Disciplinary action including suspension / Termination (CEBC)</b>

**Tech Mahindra has an internal team which draws, review and finalise policies and procedures for the effective implementation of Human Rights. Such reviews are**

**done on a periodic basis to ensure 100% compliance in line with International Labour Standards**

**We recognize that we are part of the communities in which we operate. We engage with communities on human rights matters that are important to them such as access to water and health. We also engage with people in those communities, including indigenous people as well as other vulnerable and disadvantaged groups. Our aim is to ensure through dialogue that we are listening to, learning from and considering their views as we conduct our business. We believe that local issues are most appropriately addressed at the local level.**

**Where appropriate, we engage with a wide range of civil society and stakeholders on human rights issues related to our business. This includes issues in our Company, across our value chain and with our various sponsorships, through which we seek to promote respect for human rights.**

**Tech Mahindra has a formal mechanism which take place on a yearly basis by collecting the feedback in the following categories; career, alignment, recognition, empowerment and strive. Analysis of the data is done on a business unit level and a plan of action is implemented to improve the score and participation. Tech Mahindra considers recommendations and suggestions as part of the regular feedback mechanism from their employees, for example Mcares, Freevoice, Leadership Connect and external service to collect the trends and expected human right ways as per the requirements of the supply chain.**

**Tech Mahindra along with the help of Corporate Ombudsman reports the violations to senior management and board of directors based on the review and recommendation of new processes and procedures implemented to ensure non-compliances issues are not repeated. Initiation of a new process and benchmark ideas to ensure better coverage and comprehensiveness in addressing the human rights issue.**

•  
Labour:

**Tech Mahindra is committed to exhibit zero tolerance towards all facets of modern slavery, as elaborated under the Modern Slavery Act, 2015 UK and Commonwealth Modern Slavery Act, 2018, Australia guided by the UN Declaration of Human Rights and the conventions of the International Labour Organizations specified to forced or compulsory labour.**

**In pursuance of this, we published the statement pursuant to Section 54(1) of the Modern Slavery Act 2015 and Section 3 and 12 of the Commonwealth Modern Slavery Act, 2018 (the “Act”) elucidating the initiatives undertaken to eradicate the slavery and/or human trafficking from our supply chain or in any part of our organization.**

We expect our employees and suppliers to meet the provisions set out by us in our policy for Code of Ethical Business Conduct (“CEBC”) and Diversity and Inclusion (D&I). Our Anti-Slavery policy has been captured in the Diversity and Inclusion Policy, which reflects our intention to ensure effective implementation of human integrity and complete eradication of slavery and human trafficking. To ensure complete compliance, we provide the CEBC Training, as detailed below, to all associates to increase awareness. Please refer for details at’ Modern Slavery Statement’ and ‘Code of Ethical Business Conduct’”

We, at Tech Mahindra, have an extensive training program for Code of Ethical Business and Conduct (CEBC) which covers various topics including modern-day slavery. Every individual employee of Tech Mahindra is required to undergo this training program. Awareness campaigns are conducted throughout the organization for all associates. Policy is available on intranet for reference. All associates are required to complete training and certify that they have read, understood and comply with all aspects of the Policy. Reporting Managers are responsible for ensuring that associates who report to them, directly or indirectly, comply with this Policy and complete certification and training required of them.

Tech Mahindra’s policies, employment contract, terms and conditions of engagement and employee development programs have relevance to the standard international labour principles. Tech Mahindra is also committed in ensuring that local laws and culture are upheld at their worldwide locations.

#### **COMPLYING WITH LAWS:**

The policy of Tech Mahindra is to comply strictly with all laws governing its operations, and to conduct its affairs in keeping with the highest level of moral, legal and ethical standards. Accordingly, the Directors and Associates shall respect and obey the laws of the jurisdictions in which Tech Mahindra operates and comply with all applicable laws, rules, regulations, agreements, guidelines, standards and internal policies, including other requirements incidental thereto. The company has an Insider Trading Policy, the adherence of which shall be ensured, in letter and spirit. The Directors and Associates are expected to be aware of all relevant laws and regulations involving their responsibilities as Associates of Tech Mahindra and refrain from any illegal, unethical or otherwise improper activities. When in doubt, the Directors and Associates may seek assistance from the CORPORATE OMBUDSMAN of the company.

#### **COMPETING FAIRLY:**

All Directors and Associates are obligated to deal fairly with each other, and with the Company’s customers, suppliers, competitors and third parties. Directors and Associates should not take undue advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation or any other unfair



dealing or practice. They should not discriminate on the basis of gender, race, nationality, caste and creed.

Tech Mahindra is committed to free and open competition in the marketplace. Directors and Associates should avoid actions that could reasonably be construed as being anticompetitive, monopolistic or otherwise contrary to laws governing competitive practices in the marketplace, including antitrust laws. Such actions include misappropriation and / or misuse of a competitor's confidential information or making false statements about the competitor's business and business practices.

Tech Mahindra is committed and adheres to international labour standards, in consultation with local councils, employee representatives, Works Council and Union. To ensure removal of any instances of slavery, we have regular audits within Tech Mahindra, conducted by the internal audit team. These audits aim at improving our understanding of where the risks are greatest and prioritizing our activity accordingly.

Tech Mahindra being law abiding organization, strictly adheres to and complies with all employment related laws, including laws related to working hours, wages, welfare and human rights. All employees related policies of Tech Mahindra are transparent and available for viewing to all our employees. We continually update and amend our policies to align it with global best practices and changes in relevant laws.

Tech Mahindra has multi-layer reporting structure for each employee and have processes of 360 degree feedbacks and employee satisfaction surveys ("ESAT"). Thus, every employee is able to give feedback on his/ her Reporting Managers, respective department/ function, and organization as a whole. These feedbacks are taken on annual basis and are shared with department/ function heads to be further disseminated. Departments/ functions are also rated on the basis of such 360° feedbacks and ESAT.

All employees' performances are appraised in transparent manner and on at-par basis. Employees are given opportunities to grow in their respective professions/ occupations.

Tech Mahindra undertakes several employee benefit and welfare initiatives like health awareness, entertainment etc. in order to ensure that employees work in conducive and exploitation-free environment.

In above manner, Tech Mahindra has ensured that there is no scope for any instance of slavery, servitude or human trafficking.

#### **Awareness and collaboration**

We have developed internal programs to raise awareness of issues such as slavery, forced or compulsory labour, exploitative practices by labour providers and human

trafficking. We also have effective policies in place which ensure that no young person below the legal age is hired by Tech Mahindra for any work.

#### **Building a strong supply chain**

We require our suppliers to ensure they work in alignment with applicable policies, laws and our values. We expect our suppliers to comply with all applicable regulations and legislation relating to working hours, wages, welfare, human rights. We make available to the suppliers, our policies such as Code of Ethical business conduct, which are implemented to lay foundation for strong corporate governance.

All our suppliers are expected to work in accordance with our ethos and approach with regards to health, safety, environmental and people development objectives. In this regard, we believe in supporting our suppliers through training and knowledge-sharing and hold regular forums to communicate clear expectations.

#### **Corporate governance framework**

We operate within an established and externally benchmarked corporate governance framework that is underpinned by our vision and values. A key function of our corporate governance framework is the identification, management and mitigation of risks meted out to the associates under the current working environment of Tech Mahindra. Tech Mahindra is dedicated to creating a fair and transparent work environment with mutual respect for all.

The CORPORATE OMBUDSMAN is primarily responsible for overseeing and managing compliance issues within the organization. The Corporate Ombudsman is in charge of ensuring, that the company and its Associates are complying with internal policies and procedures.

An associate can raise a concern with the Corporate Ombudsman.

Tech Mahindra treats its supplier and third parties in line with UN Convention and Labour Rights. Formal agreement and Master Service Agreement ensures that both parties are in compliance with the regulations and ensure free and fair labour conditions.

We expect our employees and suppliers to meet the provisions set out by us in our policy for Code of Ethical Business Conduct (“CEBC”) and Diversity and Inclusion (D&I). Our Anti-Slavery policy has been captured in the Diversity and Inclusion Policy, which reflects our intention to ensure effective implementation of human integrity and complete eradication of slavery and human trafficking. To ensure complete compliance, we provide the CEBC Training, as detailed below, to all associates to increase awareness.

We, at Tech Mahindra, have an extensive training program for Code of Ethical Business and Conduct (CEBC) which covers various topics including modern-day slavery. Every individual employee of Tech Mahindra is required to undergo this training program. Awareness campaigns are conducted throughout the organization

for all associates. Policy is available on intranet for reference. All associates are required to complete training and certify that they have read, understood and comply with all aspects of the Policy. Reporting Managers are responsible for ensuring that associates who report to them, directly or indirectly, comply with this Policy and complete certification and training required of them.

## **SUPPLIERS:**

Tech Mahindra, its subsidiaries and joint ventures deal fairly and honestly with their suppliers. This means that our relationships with suppliers are based on price, quality, service and reputation. Directors and Associates dealing with suppliers should carefully guard their objectivity. The Company will carry out due diligence before selection of suppliers.

The Company will ensure that its partners do not make any payments to governmental officials to secure any benefit for the Company.

Specifically, no Director or Associate should accept or solicit any personal benefit from a supplier or potential supplier that might compromise, or appear to compromise, their objective assessment of the supplier's products and prices. Directors and Associates can give or accept promotional items of nominal value or moderately scaled entertainment within the limits of responsible and customary business practice. Please see "Gifts" above for additional guidelines in this area.

## **INVESTOR RELATIONS**

Tech Mahindra investor relations shall be ethical, professional, transparent and investor friendly. We recognize the right of our investors to information and shall always be attentive to this need. The relevant information will be speedily disseminated and shall be as informative as is required to be, subject to consideration of confidentiality and applicable legislation. We respect the right of investors to express their views during investors meet including the general meetings of the company, on matters forming part of the agenda and on the performance of the company, and shall respond to their observations and queries to the fullest extent permissible. No information shall be made available on a selective basis to a specified group of investors in a manner that places them at an advantage over other group of investors. We shall always respond speedily and with courtesy to our investors on matters relating to securities held by them in the company. Please refer for details at 'Modern Slavery Statement' and 'Code of Ethical Business Conduct'

Tech Mahindra's operations and employment policies are governed by local laws, while defining such human resource policies utmost respect and commitment towards the labour regulations as per the prevailing law of the land. Tech Mahindra creates specific employee handbook which has the consolidated terms and conditions/benefits prevailing in that region.

**The code of ethical business conduct policy is indicative and associates are advised to be aware of specific nuances as applicable per laws of the land. This policy applies to all associates globally to ensure consistent understanding and application of values including integrity, behavior while ensuring due respect for local customs and tradition.**

## **MAINTAINING AN EQUITABLE AND SAFE WORKPLACE**

### **EMPLOYMENT PRACTICES:**

**The policy of the Company is to provide equal opportunities to all its Associates without being biased to their race, region, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability. The company has a policy to eliminate overt and covert bias in recruiting, promoting and separating male and female Associates. The company strives to hire people on the basis of their qualifications, prior experience, expertise and abilities, local and constitutional law mandate with regard to recruitment (if any) and is determined to provide a work environment free of any form of unlawful discrimination. The company shall promote gender equality in providing access to opportunities for training, learning, and participation in decision making. The company shall put in place organizational policies and practices that address various Associate issues including sexual harassment, work life imbalance and professional discrimination.**

**Any Associate with questions or concerns regarding any act of discrimination in the workplace is encouraged to bring the issue to the attention of his / her immediate supervisor or the head of the concerned business / support unit and further to the CORPORATE OMBUDSMAN.**

### **NON-SOLICITATION**

**The Company believes that the services of an Associate are crucial to Tech Mahindra and its clients. While employed with Tech Mahindra and a period of one year thereafter, Associates shall not solicit and shall not provide services to any of Tech Mahindra's clients (on the same account / project) with whom they have been associated in the preceding one year from the date of separation (for any reason) from Tech Mahindra. During the tenure of employment with Tech Mahindra and after the cessation of employment, the Associate is responsible for safeguarding Tech Mahindra's business and confidential information including its customers' names and other business details, information regarding technical, trade or business data. Associates should not solicit or induce or endeavour to solicit or induce any person who is employed by the company to cease working for or providing services to Tech Mahindra. Associates should not also solicit or induce or endeavour to solicit any consultant, supplier or service provider to cease to deal with the company and shall not interfere in any way with any relationship between a consultant, a supplier or a service provider and the Company. In any event of a violation of the above mentioned, Tech Mahindra reserves the right to any legal remedy available to it**

under applicable laws and claim any such damages from you as it may incur from this act of yours.

## **SEXUAL HARASSMENT**

The Company's Policy on Prevention of Sexual Harassment aims at bringing 'zero tolerance' policy on any act of sexual harassment / any discrimination based on sex and promote a work environment that encourages mutual respect, promotes respectful and congenial relationships between Associates, and is free from all forms of sexual harassment to any Associate or applicant for employment by anyone including vendors, or customers. Sexual Harassment is a form of discrimination which includes a range of behaviour from seemingly mild transgressions and annoyances, to actual sexual abuse or sexual assault, and will not be accepted in any form or manner. Sexual harassment includes conduct of associates, managers, vendors and / or customers who engage in verbally or physically harassing behaviour, which has the potential for humiliating or embarrassing an associate of the Company. According to Tech Mahindra's Policy on Prevention of Sexual Harassment.

All of the Company, both management and non-management, are responsible for assuring that a workplace free of sexual harassment is maintained.

Any Associate may file a sexual harassment complaint regarding incidents experienced personally or incidents observed in the workplace.

The Company is committed to maintaining a lawful, pleasant work environment where all Associates are able to effectively perform their work without interference of any type and requests the assistance of all Associates in this effort.

All Company supervisors and managers are expected to adhere to the Company's Policy on Prevention of Sexual Harassment Policy.

## **HEALTH AND SAFETY**

Protecting the environment and the health and safety of Associates is of prime importance to the company and the company strives to provide a safe, healthy and hygienic environment to its workforce. The company attaches the greatest value to its personnel. It conducts its operations in a safe manner that minimizes adverse environmental impact. It strives to prevent all possible accidents, incidents, injuries and occupational illness.

Company believes in creating awareness among its Associates on work place practices and communicating information, instruction and training programs to all the Associates to enable them to comply with the Environment, health and safety policy of the company.

## **ENVIRONMENTAL COMPLIANCE**

**We will minimize the potentially harmful effects of our activities on the environment.**

**We are committed to protect and preserve the environment. We will endeavour to reuse rather than dispose whenever possible. We will also promote recycling and the use of recycled materials.**

## **HUMAN DIGNITY**

**We are committed to treating those engaged with our Company with dignity and respect.**

## **HARASSMENT**

**Harassment is any form of behavior that is unwelcome, unsolicited, unreciprocated and usually (but not always) repeated. It is the behavior that has the purpose or effect of violating an associate's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment, and in the perception of the recipient of the conduct, it should reasonable be considered as having that purpose or effect.**

**For harassment to occur there does not have to be an intention to offend or harass. It is the impact of the behavior on the person who is receiving it, together with the nature of behavior, which determines whether it is harassment or not.**

**Some common examples of harassment are:**

- Telling insulting jokes about particular groups or genders.**
- Displaying offensive posters or screen savers.**
- Making derogatory comments about someone's race or religion.**
- Offensive physical contact, derogatory language or intimidating actions.**
- Using any kind of abusive language in the workplace.**
- Insulting or threatening gestured or language (overt or implied) or continual and unwarranted shouting in the workplace.**
- Unjustified and unnecessary comments about an associate's work or capacity for work.**
- Openly displayed pictures, posters, graffiti or written materials which might be offensive to some.**
- Phone calls or messages on electronic mail/snail mail or computer networks which are threatening, abusive or offensive to associates.**
- The exclusion of an associate or group from normal conversations, work assignments, work related social activities and networks in the workplace.**

**Abuse of Managerial Authority:**

**Abuse of Managerial authority means conduct by a Reporting Manager in relation to an associate who reports to them or over whom they have supervisory authority and which:**

- Intimidates, humiliates or undermines another associate by belittling them, or**
- Excessively, destructively or inappropriately criticizing or reprimanding them, or excessively scrutinizing their work, or**
- Makes demands that are unreasonable and/or outside that other associate's role; or**
- Makes demand to perform an action that is in breach of the principles of any policy of TechM**

## **DRUGS, ALCOHOL AND SMOKING:**

**All associates including third party vendor personnel working in Tech M premises must be free of impairment due to alcohol or drugs (banned substance)**

### **Alcohol:**

**Unauthorized possession or use of alcohol at Tech Mahindra premises is prohibited**

### **Drugs:**

**The illegal possession, use, sale, manufacture or distribution of illegal drugs (including the abuse or misuse of legal drugs) at company premises or while on company business activities is banned.**

**Tech M maintains an abuse-free workplace. All its Suppliers and their Workers, are required to ensure that their employees, independent contractors and consultants, and all individuals whom they engage to work on Tech Mahindra premises and/or Tech Mahindra projects under their control and/or supervision, are compliant with Tech M abuse-free workplace standards.**

### **Smoking:**

**We owe and assure a smoke free environment for our Associates. Entire Tech Mahindra office premises across the globe including conference rooms, lobbies are declared as No Smoking Zone.**

**Tech Mahindra undertakes several employee benefit and welfare initiatives like health awareness, entertainment etc. to ensure that employees work in conducive and exploitation-free environment.**

**Thus, we ensure that there is no scope for any instance of slavery, servitude or human trafficking.**

**Tech Mahindra has well defined organizational structure, including, bands, roles, KRA's and targets. Job description for each employee is described and**

communicated in a formal manner to the employee. Such job description is in line with organization objectives and goals. Tech Mahindra is committed to raise awareness amongst its employees and supervisors in line with labour principles and standards. Such awareness program is administered at the time of joining and it reviewed periodically.

Tech Mahindra being law abiding organization, strictly adheres to and complies with all employment related laws, including laws related to working hours, wages, welfare and human rights. All employees related policies of Tech Mahindra are transparent and available for viewing to all our employees. We continually update and amend our policies to align it with global best practices and changes in relevant laws.

Tech Mahindra undertakes several employee benefit and welfare initiatives like health awareness, entertainment etc. to ensure that employees work in conducive and exploitation-free environment.

Tech Mahindra has in place a standardized Performance Management Framework and systematic process of managing performance activities, thus helping build a performance driven culture.

#### **ENABLING A FLEXIBLE WORK CULTURE**

We believe that providing a flexible work culture helps us retain talent and keeps our employees motivated and engaged. We have a suite of flexible work arrangements across all countries we operate in which may include benefits like Parental Leave, Paternity and Maternity leave, Sabbatical for Higher Education, Time off for personal reasons, time off for Individual Corporate Responsibility and Corporate Social Responsibility activities etc.

#### **PROMOTING EMPLOYEE MORALE, SKILL UPGRADATION AND CAREER DEVELOPMENT**

All our employees are covered under competency development programs that are relevant to their role in the organization. Our Competency Development Program brings relevance and flexibility to competency development for a role along multiple competency dimensions. Our continuous education programs, delivered through the state of the art Upskilling as a Service (UaaS) platform, span technology, domain, business, process, behaviour and leadership.

The Upskilling-as-a-service platform of #NewAgeDelivery enables associates to stay relevant and develop a culture of continuous learning. The AI based platform deploys Skill Knowledge Unit (SKUs) to provide holistic learning for employees and provides interactive, on-demand, contextual and personalised #upskilling to



associates in self-service mode through world class content and assessments from various learning partners.

We provide training to all employees without differentiating on grounds of gender, age or physical ability. We also have specialized programs for senior leadership. Our Training group offers industry benchmarked learning programs to ensure talent enablement. The Training team has number of learning offerings and interventions including training on technical, managerial and process skills, industry domain knowledge and leadership skills for employees and our strategic clients.

Tech Mahindra's commitment to Governance, Ethical Business Conduct, Human Right, Environmental Stewardship and Sustainability also extends to our value chain. This enables us to mitigate and manage risks posed by the supply chain to our business operations. We engage with our suppliers annually and support them in building their capabilities on sustainable practices and business ethics. All suppliers are expected to abide by the SSCM Policy and the Supply Chain Code of Conduct while demonstrating a commitment to incorporating best practices and continuous improvement in their activities and processes. We enable supply chain responsibility through a 3-step process which included supplier audit (both questionnaire-based as well as on-site inspections) and assessment, supplier capacity building and supplier continuous improvement programmes and climate risk evaluation.

**Environment:**

**Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship**

Our commitment to environmental sustainability, climate change, and water security spans our entire business and we are pursuing plans that will have long-term impacts on the planet and communities, leading to a balance between sustainability and overall business profitability. We have implemented Sustainability, Climate Change and Environment policy towards Environmental stewardship. Our environmental reporting is according to GHG protocol, GRI standards and TCFD framework and is externally assured by third party KPMG according to limited Assurance requirements of International Federation of Accountants' (IFAC) International Standard on Assurance Engagement (ISAE) 3000 (Revised) and ISAE 3410. Please find the assurance statement of GHG emissions at <https://cache.techmahindra.com/static/img/pdf/statement-of-ghg-assurance-fy-2019-20.pdf>.

Reference to relevant international conventions and other international instruments (e.g. Rio Declaration on Environment and Development) and Specific commitments & goals for specified years:

TechM is supporters of Caring for Climate initiatives and TCFD towards our climate action. Tech Mahindra has participated in World Economic Forum Davos

agenda. Our Integrated Report which is externally assured by KPMG is according to IIRC and TCFD framework and GRI standards. We are committed to reduce our Scope 1 and 2 emissions by 22% until 2030 and 50% until 2050, which is approved by SBTi. We are signatory to Business Ambition for 1.5°C to hold a rise in global temperature below 1.5°C. We have taken a target to increase our Renewable energy to 50% by 2025. We have voluntarily implemented an internal Carbon Price of \$10 per ton of carbon to boost our Green Investment moving towards a low carbon economy.

**Reflection on the relevance of environment stewardship for the company:**

Material issues are those that reflect our significant economic, environmental and social impacts; and those that substantively influence the assessments and decisions of the stakeholders. We carry out materiality assessment to identify and prioritise the most pertinent challenges and opportunities for Tech Mahindra. It helps us to focus on matters that can affect our ability to create value over the short, medium and long term. It also helps us identify climate change and sustainability risks and opportunities while maintaining focus on stakeholder expectations and needs. In determining the material matters, we considered the views of both internal and external stakeholders. Formal and informal interactions were carried out with key stakeholders including customers, partners and collaborators, academic institutions and investors to arrive at issues perceived as critical by them. The environmental topics of Climate change, energy, water, waste, and biodiversity are all material topics under the overarching umbrella of environmental management. Responsible environment management and stewardship are management priority. There are focused targets in the sustainability roadmap for each of the environmental priorities which can be referred on page 56 and 57 at

<https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>

Across our facilities we are increasing environmental sustainability, incorporating the elements of green building, and are greening our data centers to remain oriented with our sustainability objectives of energy efficiency, carbon neutrality, water stewardship, and responsible management of waste. We are reducing our carbon footprint by installing solar modules and signing PPA's, replacing CFL's with LEDs, installing motion sensors, using star rated and efficient equipment to increase energy efficiency. We have increased our Renewable energy from 1.77% (in FY16) to 17.60% (in FY20) saving more than 19000tons of CO<sub>2</sub>e and installing energy efficient equipment saved around 6000tons of CO<sub>2</sub>e. We have adopted Reducing-Recycling-Recovering-Reusing practices for waste management to move towards circular economy. We have digitalized internal communications enabling virtual meetings through conferencing systems resulting in reducing travel emissions. We are investing in Green Solutions like smart grid, smart cities, smart waste management systems and electric vehicle charging systems. We are also working with suppliers and vendors to cut down on logistics and transportation and thus reduce our emissions.

**Assessment of life cycle impact of products, ensuring environmentally sound management policies:**

**Our strong governance policies, resilient strategies, and commitment towards sustainability have positioned us on the Leadership Board of World's Sustainability indices like CDP (Carbon Disclosure Project), DJSI World Index (Dow Jones Sustainability Index), Ecovadis, FTSE (Financial Times Stock Exchange), etc. We aim to reduce environmental impacts throughout the life cycle in our operation while providing service to our Customers, by increasing our renewable energy consumption, installing solar modules, LEDs, fitting motion sensors, using star-rated and efficient equipment, and reducing, recycling, and reusing waste. We ensure that all waste we generate from our own activities is reused, repurposed, or recycled through authorised recyclers and vendors. We aim to decrease transport emissions by using improved logistics policies and inventory control measures. We have digitalized internal communications with virtual meetings through tele/ audio-conferencing that bring down meeting related travel considerably. We ensure compliance with applicable environmental regulation in the areas we operate and go beyond to fulfil our corporate responsibility. We measure our Scope 1, 2 and 3 emissions during our Life Cycle Assessment. The Scope 1 emissions include fuels like a diesel from backup Generators, diesel, and petrol from owned cars. Scope 2 emissions are from the electricity purchased from the grid. Our Scope 3 emission includes Business Travel, Employee Commute, Waste generated from operation, Fuel and Energy activities and Purchased Goods and Services. We encourage our Suppliers to use increasing amounts of recycled and recyclable content in their new products that are to be supplied to TechM. We have procured materials like PCs and display which include 24% of recycled plastic content as defined by the IEEE 1680.1 2018 EPEAT standard to reduce emissions.**

**Please refer our integrated report 2020 for more details on scope 1,2 &3 from page 160-164 at:**

**<https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>**

**Inclusion of minimum environmental standards in contracts with suppliers and other business partners:**

**At Tech Mahindra we empanel Nationally and Internationally acclaimed 3rd Party Background Verification Vendors. We maintain exceptional quality criteria prior to empanelling the vendors especially Resource Management Vendors and review their performance on annual basis with structured feedbacks. We have a Sustainable Supply Chain Management Policy (SSCM) which lays out guidelines for the Supplier Code of Conduct (SCOC). All suppliers are expected to abide by the SSCM Policy and the SCOC while demonstrating a commitment to incorporating best practices and continuous improvement in their activities and processes. The key aspects of the SSCM for all suppliers are:**

- i) Ethical business conduct**
- ii) Commitment to human rights and fair employment practices in alignment with internal standards including the UN Declaration of Human Rights etc.**
- iii) Promote a work environment that is safe and healthy**

- iv) Have a robust risk management processes for ethics, environmental and social risks
- v) Provide products or services to TechM and conduct business operations in an environmentally sustainable manner
- vi) Fulfil their responsibility towards their local communities
- vii) Encourage the same practices in their supply chains
- viii) Have a Business Continuity Plan (BCP), to minimize business impacts in the event of major disruption.

We bind all our suppliers to the following social, ethical and environmental minimum standards of conduct and encourage them to adopt our preferred and favoured standards. We enable supply chain responsibility through a 3-step process which included supplier audit (both questionnaire-based as well as on-site inspections) and assessment, supplier capacity building and supplier continuous improvement programmes and climate risk evaluation.

We conduct supplier audits, which help us understand the potential ESG (Environmental, Social and Governance) risks within the Supply Chain. We encourage our suppliers to track and reduce their GHG emissions.

We are working across our supply chain on various initiatives to reduce business travel and logistics by trip optimization, reducing travel frequency and examining the need for travel. We manage our supply chain responsibly to ensure our business is not adversely affecting the environmental values of communities globally and are working to reduce GHG emissions across the supply chain. For more details please refer on page 191 on responsible supply chain at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>

**Criterion 10: The COP describes the effective management systems to integrate the environment principles**

#### **Environmental risk & impact assessment**

Tech Mahindra has a designated Board Risk Management Committee (RMC), which periodically reviews the risk management framework and identifies critical risks along with their mitigation plans. The Chief Risk Officer of Tech Mahindra coordinates with the risk officers nominated by functional heads of each business unit to identify the risks. We define risk impact as an estimate of the severity of adverse effects, or the magnitude of a loss, or the potential opportunity cost. Tech Mahindra defines strategic impact under 5 categories i.e., business environment, competition, customer, supplier, and government. Severity and impact of risk are to be identified into low, medium-low, medium, medium-high, high as to prioritize the action plan and a consolidated risk register compiled by the Chief Risk Officer (CRO) with the inputs from the Risk officers on a quarterly/ half-yearly basis

Given the nature of our business, we are focusing on de-risking our operations for regulatory risk, increase on carbon price & to keep committed to the Paris Agreement on climate change (de-carbonization required to keep global

temperature increase below 2°C), we identified 2DS scenario to best fit & performed a high-level assessment of impact of 2°C global warming.

Please refer details on climate-related risk and mitigation strategies on page 66-72 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>

**Allocation of responsibilities and accountability within organisation:**

The CSR committee of the Board is the apex body responsible for oversight and decision making on economic, environmental and social aspects of Sustainability and CSR across the organisation. The Committee is the final authority for review, prioritisation of material matters and decision making on CSR and Sustainability, including climate change. Strategic integration of climate related risks with business is performed by the CSR committee which comprises of Board members and Managing Director & CEO of Tech Mahindra. The CEO reviews Sustainability performance, progress and implementation of Sustainability policies and initiatives and briefs the committee on Sustainability and climate-related agenda and performance of the company. Tech Mahindra Sustainability council includes CFO, CPO, CSO, head of Legal and Corporate Services. They formulate Sustainability vision, strategy, and plan of action in alignment with the sustainability charter and roadmap of the company. They review progress on our sustainability and climate change agenda each quarter and approve annual budget and expenditure. Chief Sustainability Officer (CSO) is responsible for overall implementation of climate change and sustainability strategy and initiatives; developing budgets and plans for sustainability and climate change. For more details please refer on page 35-37 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>

**Internal awareness raising & training on environmental stewardship for management and employees:**

We have a training platform for Environmental Sustainability for our associates. We also have external Sustainability eLearning course by UNGC for our associates. There are various internal awareness trainings on Biodiversity, climate change risks and mitigation, water conservation, waste utilisation, circular economy and carbon impact etc. Also, we have various trainings like Health and Safety, Emission Management, Adopting low emission products etc. Our efforts are driven by the Green Marshals - a small band of TechMighties who are passionate about spearheading the cause of environmental sustainability. It enables us to create a platform for the associates to engage in co-curricular and societal activities driven towards environmental stewardship and carbon responsibility. Over the years the band of Green Marshals has increased along with their volunteering hours on environmental initiatives. For details please refer on page 174-175 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>

**Grievance mechanisms, communication channels and other procedures (e.g. whistleblower mechanism) for reporting concerns or seeking advice regarding environmental impacts:**

**Sustainability Champion from across corporate function executes and monitors policies and initiatives including sustainability and climate-related issues which are aligned to the company's strategy. We have a robust grievance handling mechanism in place to address any issue that might occur during any moment during an associates' life cycle at Tech Mahindra. The Whistle-blower Policy encourages employees to report non-compliance with relative anonymity. For process of Grievance mechanism through Whistle-blower, please refer on page 4-5 at [https://cache.techmahindra.com/cache/investors/WhistleBlower\\_Policy.pdf](https://cache.techmahindra.com/cache/investors/WhistleBlower_Policy.pdf). Free Voice platform helps our associates to raise complaints and suggestions anonymously, which led to several improvements in our policies and practices. The Green Marshals (our Green volunteers) consistently devise methods to motivate Employees for Green activities by Making Sustainability Personal.**

**Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship:**

**System to track and measure performance based on standardised performance metrics:**

**Tech Mahindra has well defined tracking mechanism of KPI's (Key Performance Issues) that impacts People, Planet and Profit of the company and its stakeholders. The issues are identified and prioritized with definite magnitude and timeframes. The key KPI's are clubbed under four key imperatives – people, environment, business & innovation, and governance & ethics. Final roadmap targets are taken on each KPIs which are according to our Sustainability framework. For more details on targets and performance of these KPI's, please refer on page 51-56 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>. We measure and monitor the impact according to GRI standards and material issues identified and disclosed in our Integrated Report which is externally assured by third party KPMG on page 14-16 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>**

**Leadership review of monitoring and improvement results:**

**The Board has an oversight of sustainability and climate change issues and receives regular update on climate change actions in the board meetings each quarter. The Risk Management Committee of the Board monitor assess and review climate and sustainability risks in alignment with TCFD recommendations. The CSR committee appointed by the Board reviews and guides Sustainability and climate strategy, major plans of action, risk management policies, budget plans as well as Sustainability performance of the company. The CEO reviews Sustainability performance, progress and implementation of Sustainability policies and initiatives and briefs the committee on Sustainability and climate-related agenda and performance of the company. Tech Mahindra Sustainability council which includes**

**CFO, CPO, CSO, head of Legal and Corporate Services review progress on our sustainability and climate change agenda each quarter. The environmental reporting data is monitored by the Sustainability Champions every month and reviewed by the Corporate Sustainability cell each quarter and the Sustainability Council every six months. Sustainability Champion from across corporate function executes and monitors policies and initiatives including sustainability and climate-related issues which are aligned to the company's strategy. Our strong governance policies, resilient strategies and commitment towards sustainability have positioned us on the Leadership Board of World's Sustainability indices like CDP (Carbon Disclosure Project), DJSI World Index (Dow Jones Sustainability Index), Ecovadis, FTSE (Financial Times Stock Exchange), etc. More details are available at <https://www.techmahindra.com/en-in/sustainability/> .**

**Process to deal with incidents:**

**Tech Mahindra evaluates the climate-related risks and how they affect our resilience and financial stability. Our business continuity management framework and incident response team ensure we are resilient to any external risks including climate change. We have a structured Information Management System in place to track all types of incidents relating to environmental issues. TechM has established a procedure for reporting incidents, analyzing the incidents and taking preventive/corrective actions which are overseen and driven by the HSE (Health, Safety & Environment) Team. For effecting reporting of incident, HSE team has created an incident portal which tracks incidents related to events leading to: Medical urgency which covers - injury, ill-health, environmental accidents or potential to injury. The procedure applies to all personnel having access to the workplace. The Safety committee across locations communicates any incident recorded, every quarter. The Safety Committee also conducts a physical survey of campus to find areas for improvement in safety. We regularly carry out online sessions on safety through WebEx, and WoW Portal. There are periodic DRP drills on fire and other identified risks, background checks and other Surveillance trainings. For details please refer on page 136 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>**

**Audits and other steps to monitor and improve the environmental performance of companies in the supply chain:**

**Tech Mahindra's commitment to Governance, Ethical Business Conduct, Environmental Stewardship and Sustainability also extends to our value chain. This enables us to mitigate and manage risks posed by the supply chain to our business operations. We engage with our suppliers annually and support them in building their capabilities on sustainable practices and business ethics. We enable supply chain responsibility through a 3-step process which included supplier audit (both questionnaire-based as well as on-site inspections) and assessment, supplier capacity building and supplier continuous improvement programmes and climate risk evaluation. We conduct supplier audits, which help us understand the potential ESG (Environmental, Social and Governance) risks within the Supply Chain. We encourage our suppliers to track and reduce their GHG emissions. Tech Mahindra conducts supply chain sustainability audit to its top suppliers based on annual**

market spend. They are assessed using a supply-chain questionnaire, which requires their compliance with aspects on Labor and Human Rights, workplace management, Occupational health and safety, Risk management, Environmental compliance, Corporate governance and ethics, Supply chain and Community Engagement. Stratified samples of these suppliers representing different locations, categories of suppliers and the total annual spending were chosen for on-site audits. The key mandate during the audit is on compliance and measures taken to account for and to reduce GHG emissions. The observations, findings, and recommendations of the audit are shared with the suppliers audited to drive continuous improvement programmes. Capacity building workshops are conducted annually for the suppliers. The main topics covered in the capacity building workshop included: Environmental Stewardship, Conservation of Resources, Reduction of Carbon Footprint, Social Responsibility etc. We periodically evaluate the impact of climate change in the upstream supply chain on our business operations and activities. We carry out a comprehensive risk analysis of our supply chain on their ability to deliver on time because of the market and climate-related risks. We track the Scope 3 emissions from transportation and distribution of products purchased from our suppliers and operations of vehicles not owned or operated by us are tracked. This includes multi-modal shipping where multiple carriers are involved in the delivery of a product. We are engaging with our suppliers to initiate the process of tracking, monitoring, reviewing and analysis of the GHG emissions of the supply chain. Please refer to page no 193 of Tech Mahindra Integrated report 2020: <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>

**Outcomes of integration of environmental principles:**

Tech Mahindra has robust mechanism to track and reports environmental indicators according to GRI standards which is externally assured by third party KPMG on page 14-15 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>.

We comply with all environmental laws and regulations. In the reporting year, there were no fines, penalties, or show cause notices for non-compliances with applicable environmental regulation at any of our locations. Integration of environmental principles helped us for:

- 1) Making smart and alternative innovations which can protect environment
- 2) Competitive differentiation
- 3) Optimizing resources thus saving operational costs
- 4) Improving Sustainable living conditions
- 5) Climate Risk Avoidance and mitigation

Criteria and best practices under Anti-Corruption implementation have been modified to reflect the [Anti-Corruption Reporting Guidance \(pdf\)](#). Best practices reflect specific reporting elements of the guidance, either Basic (numbers starting with B) or Desired (numbers starting with D) – these matrix of reporting elements can be found on page 14 of [Anti-Corruption Reporting Guidance \(pdf\)](#).

**Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption**



**Publicly stated formal policy of zero-tolerance of corruption (D1)**

**Tech Mahindra has a formal policy highlighting zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all our business dealings and relationships. The Anti-Corruption and Bribery policy is made available on our website so that relevant stakeholders can see and comply with our policy. Anti-Corruption and Bribery policy at <https://cache.techmahindra.com/static/img/pdf/Anti-Corruption-and-Bribery-Policy.pdf> . If any associate suspects or becomes aware of any potential bribery involving the Company, it is the duty of that associate to report their suspicion or awareness to the Company Corporate Ombudsman at [CORPORATEOMBUDSMAN@techmahindra.com](mailto:CORPORATEOMBUDSMAN@techmahindra.com). Bribery is a serious criminal offence in countries in which the Company operates, including India, the United Kingdom (UK Bribery Act 2010), the United States of America (Foreign Corrupt Practices Act) and others. Bribery offences can result in the imposition of severe fines and/or custodial sentences (imprisonment), exclusion from tendering for public contracts, and severe reputational damage. We therefore take our legal responsibilities very seriously. We will uphold all laws relevant to countering bribery and corruption.**

**The purpose of this policy is to:**

- a) set out our responsibilities to comply with laws against bribery and corruption; and**
- b) provide guidance on how to recognise and deal with bribery and corruption issues.**

**The Company will undertake a periodic bribery and corruption risk assessment across its business to understand the bribery and corruption risks it faces and ensure that it has adequate procedures in place to address those risks. The risk assessment will be documented and periodically reviewed, and the appropriate committee of the Board of Directors of the Company is be updated on a half yearly basis in accordance with applicable regulations.**

**Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes (B2)**

**Tech Mahindra is committed in implementing and complying with the applicable acts and regulations with reference to Anti-Corruption Laws wherever it has its operations. The Anti-Corruption and Bribery policy applies to all individuals working for Tech Mahindra Limited, its subsidiaries, joint ventures and affiliates anywhere in the world, and at all levels and grades.**

**This includes senior managers, officers, directors, employees (whether regular, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or**

any other person associated with us, or any of our subsidiaries, joint ventures or their employees, wherever located (collectively referred to as "associates" in this policy).

In this policy, third party means any individual or organisation that an associate may come into contact with during the course of his/her engagement with the Company, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, business associates (including rainmakers etc.) and government, non-government organizations and public bodies including their advisors, representatives and officials, politicians and political parties. Please refer for more details at

<https://cache.techmahindra.com/static/img/pdf/Anti-Corruption-and-Bribery-Policy.pdf>

Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption (D2) Detailed policies for high-risk areas of corruption (D4)

Tech Mahindra understands that Bribery is a serious criminal offence in countries in which the Company operates, including India, the United Kingdom (UK Bribery Act 2010), the United States of America (Foreign Corrupt Practices Act) and others. Bribery offences can result in the imposition of severe fines and/or custodial sentences (imprisonment), exclusion from tendering for public contracts, and severe reputational damage. We therefore take our legal responsibilities very seriously and uphold all applicable and relevant laws in countering bribery and corruption. Tech Mahindra sets out its responsibilities to comply with laws against bribery and corruption and provide guidance to its employee and relevant stakeholders in dealing with bribery and corruption issues. Please refer for more details at <https://cache.techmahindra.com/static/img/pdf/Anti-Corruption-and-Bribery-Policy.pdf>

Policy on anti-corruption regarding business partners (D5)

Tech Mahindra has a robust framework on Anti-Corruption including a dedicated policy applicable and available to all. Third parties can put the Company at risk if they do not follow ethical business practices. For that reason, the Company will develop procedures for conducting appropriate risk-based due diligence on third parties, and the implementation of appropriate steps to address any identified risks, to ensure compliance with applicable anti-corruption laws. Associates must carefully follow the procedures that are established under this policy. Please refer for more details at <https://cache.techmahindra.com/static/img/pdf/Anti-Corruption-and-Bribery-Policy.pdf>. Our Supply Chain code of Conduct policy applies to all the suppliers, vendors, contractors and companies who provide Tech Mahindra with products and services (suppliers, vendors, contractors and companies who provides us with products and services shall henceforth be referred as "Suppliers"). According

to the policy the Supplier shall maintain effective anti-corruption, anti-fraud and antibribery programs and comply with these prohibited business practices. For more details please refer on page 6 at

<https://cache.techmahindra.com/static/img/pdf/SSCM-Supplier-Code-Of-Conduct.pdf>.

**Criterion 13: The COP describes effective management systems to integrate the anti-corruption principle**

**Support by the organization's leadership for anti-corruption (B4)**

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The head of the Human Resources Department of the region has primary day-to-day responsibility for implementing this policy. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this policy and, if necessary and appropriate, are given adequate and regular training on it. Please refer for details on page 7 at

<https://cache.techmahindra.com/static/img/pdf/Anti-Corruption-and-Bribery-Policy.pdf>.

Organizational Leadership is committed in promoting and implementing the Anti-corruption program across the organization, including but not limited to Open House, All Hands Meet and Fire chat Session enforcing our commitment to zero tolerance.

**Carrying out risk assessment of potential areas of corruption (D3)**

The Company will undertake a periodic bribery and corruption risk assessment across its business to understand the bribery and corruption risks it faces and ensure that it has adequate procedures in place to address those risks. The risk assessment will be documented and periodically reviewed and the appropriate committee of the Board of Directors of the Company be updated on a half yearly basis in accordance with applicable regulations.

**Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees (B5 + D8)**

Tech Mahindra has a robust awareness and certification program for Zero Tolerance on Anti-Corruption and Bribery. As part of the induction program it is mandatory for employees to comply with this program

The head of the Human Resources Department of the region will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvement identified will be made and incorporated as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

**All associates are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.**

**Associates are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Head – HR Operations. This policy does not form part of the associate’s contract of employment and it may be amended at any time by the Company. Please refer for more details at <https://cache.techmahindra.com/static/img/pdf/Anti-Corruption-and-Bribery-Policy.pdf>.**

**Internal checks and balances to ensure consistency with the anti-corruption commitment (B6)**

**Regular awareness programs amongst the employees including periodic proactive check and audit to ensure consistency of Anti-Corruption and Bribery is implemented across the organization.**

**Dissemination of this policy for new joiners is carried out at the time of induction. This policy will also be shared with all existing associates. The Company’s zero-tolerance approach to bribery and corruption should be communicated to all agents, suppliers, contractors and business partners at the outset of the Company’s business relationship with them and as appropriate thereafter. Wherever possible, all third parties should be sent a copy of this policy at the outset of the business relationship.**

#### **WHO IS RESPONSIBLE FOR THE POLICY?**

**The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The head of the Human Resources Department of the region has primary day-to-day responsibility for implementing this policy. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this policy and, if necessary and appropriate, are given adequate and regular training on it.**

**The head of the Human Resources Department of the region will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvement identified will be made and incorporated as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. All associates are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing. Associates are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Head –HR Operations. This policy does not form part of the associate’s contract of employment and it may be amended at any time by the**

**Company. Please refer for more details on page 7 at <https://cache.techmahindra.com/static/img/pdf/Anti-Corruption-and-Bribery-Policy.pdf>.**

**Actions taken to encourage business partners to implement anti-corruption commitments (D6)**

**Tech Mahindra prefers suppliers who establish management systems (policies, plans, accounting and reporting mechanisms, and performance measures) which provide for compliance assurance and continual improvement, have an Employee Code of Conduct, and that report externally on social, ethical and environmental performance. According to Tech Mahindra's Supply Chain Code of Conduct policy and supplier must strictly comply with all local and national laws and regulations on prohibited business practices like bribery, corruption, fraudulent practices and kickbacks of any kind and must conduct their business in accordance with high ethical standards. Please refer for details on page 6 at**

**<https://cache.techmahindra.com/static/img/pdf/SSCM-Supplier-Code-Of-Conduct.pdf>.**

**The CORPORATE OMBUDSMAN will ensure and ascertain prima facie the credibility of the charge. If initial enquiry indicates further investigation is required, they can appoint a Redressal Committee if necessary**

**Following below are the Reward and Recognition to encourage and implement Anti-Corruption and Bribery policy.**

**Category 1: Appreciation for all deserving cases, for whistle blowing – Certificate/Letter to be released by Ombudsman team.**

**Category 2: INR 5K (India based associates)/US\$ 100 (onsite based associates) reward + certification for all those whistle-blowers where it went on to get investigated and resulted in > US\$ 10K savings/recoveries**

**Category 3: INR 5L (India based associates)/US\$ 10K (onsite based associates) reward + certification for all those whistle-blowers where it went on to get investigated and resulted in > US\$ 1M savings/recoveries.**

**Management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7)**

**Tech Mahindra Management is responsible in bringing the awareness and implementation of the policy amongst its employees. The head of the Human Resources Department of the region has primary day-to-day responsibility for implementing this policy. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this policy and, if necessary and appropriate, are given adequate and regular training on it. For details please refer on page 7 at <https://cache.techmahindra.com/static/img/pdf/Anti-Corruption-and-Bribery-Policy.pdf>**

**As part of the implementation process "whistleblower complaint" can be raised to the CORPORATE OMBUDSMAN. All the stakeholders have an obligation to raise such concerns as soon as possible. Alerting potential issues will assist in promoting compliant corporate environment and will protect Tech Mahindra's reputation.**

**All the stakeholders shall address the complaints/concerns to the CORPORATE OMBUDSMAN. In case of a complaint/concern against CORPORATE OMBUDSMAN, the same shall be addressed to the Vice Chairman of the Board of Directors.**

**Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice (D9)**

**Whistle Blower policy is shared with all Associates, Investors, customers, vendors and other stakeholders an avenue to raise concerns, in line with the commitment of Tech Mahindra to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication.**

**Tech Mahindra's Whistle-blower Policy is a critical means through which stakeholders can raise actual or suspected violations. The policy is applicable to all Associates (including permanent and on contract) Customers and Suppliers / Vendors of Tech Mahindra.**

**The policy sets out ways through which the stakeholders can raise concerns that relate to actual or suspected violations of the Code of Ethical Business Conduct, Accounting, Internal Accounting Controls, Auditing Matters and applicable national and international laws including statutory / regulatory rules and regulations which includes but not limited to Companies Act, SEBI and SEC Regulations.**

**A "whistle-blower complaint" is a complaint where a Complainant / Whistle Blower (person raising the Complaint) believes that Tech Mahindra (or an officer or Associate of Tech Mahindra) has, or may have, breached the Code of Ethical Business Conduct, Accounting, Internal Accounting Controls, Auditing Matters and applicable national and international laws including statutory / regulatory rules and regulations.**

**Alerting Tech Mahindra to potential issues will assist in promoting compliant corporate environment and will protect Tech Mahindra's reputation. All the stakeholders have an obligation to raise such concerns as soon as possible.**

**All the stakeholders shall address the complaints / concerns to the CORPORATE OMBUDSMAN. In case of a complaint / concern against CORPORATE OMBUDSMAN, the same shall be addressed to the Vice Chairman of the Board of Directors. For more details, please read the Company's Whistle Blower Policy. Please refer for more details at '[Code of Ethical Business Conduct](#)'**

**Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption**

**Leadership review of monitoring and improvement results (D12)**

Corporate Ombudsman provides quarterly reports to the Board of directors with a copy to CEO and Head – HR. Corrective measures including policy and process changes as recommended by the Leadership Team is implemented by Compliance Team.

The head of the Human Resources Department of the region will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvement identified will be made and incorporated as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. For details please refer on page 7 at <https://cache.techmahindra.com/static/img/pdf/Anti-Corruption-and-Bribery-Policy.pdf>

**Process to deal with incidents (D13)**

Tech Mahindra has a detailed process to deal with corruption incidents. A 7-member Redressal Committee consisting of experts will be formed with the right knowledge and objectivity from within the company. Members from this committee shall be assigned to investigate into the matter within 48 working hours of receipt of the whistle bower complaint.

**Public legal cases regarding corruption (D14)**

So far Tech Mahindra does not have any public legal cases regarding corruption. Please refer on page 143 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>

**Use of independent external assurance of anti-corruption programmes (D15)**

Our anticorruption policies and procedures are externally assured by third party KPMG according to GRI standards. Please refer more details on page 15 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>

**Outcomes of integration of the anti-corruption principle**

Bribery and Corruption is a multi-dimensional issue that can be a risk to our brand, reputation and business growth. Bribery is a serious criminal offence in countries in which the Company operates, including India, the United Kingdom (UK Bribery Act 2010), the United States of America (Foreign Corrupt Practices Act) and others. Bribery offences can result in the imposition of severe fines and/or custodial sentences (imprisonment), exclusion from tendering for public contracts, and severe reputational damage. We therefore take our legal responsibilities very seriously. We will uphold all laws relevant to countering bribery and corruption. We have

adequate checks and balances in place to ensure that there are no direct or indirect incidents of bribery or corruption. We have a zero-tolerance approach to bribery and corruption.

Tech Mahindra's Anti-Corruption and Bribery Policy is implemented to create an avenue to raise concerns, in line with the commitment of Tech Mahindra to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication. Please refer details on page 143 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>

**Criterion 15: The COP describes core business contributions to UN goals and issues**  
**Align core business strategy with one or more relevant UN goals/issues**

The Sustainable Development Goals (SDGs) are a call for action to end poverty, protect the planet, and ensure peace and prosperity for all. They present an opportunity to act and address some of the pressing challenges facing the world today. All 17 Goals are interconnected, where the achievements in one impacts the success for other goals.

To support the national agenda, it is important for companies to align their business objectives with the SDGs. Tech Mahindra has encapsulated the SDGs into business planning and activities, with a focus on the SDGs that most closely align to the company's activities and have the greatest impact on them. We are on a journey to embed the SDGs into our business planning and activities, with a focus on those SDGs that most closely align to the areas where we have the greatest influence and impact

We are committed and taking focused action to combat climate change. Initiatives to build climate resilience in our operations and financial planning are becoming a norm. We are integrating environment and climate imperatives into our corporate strategy.

**Develop relevant products and services or design business models that contribute to UN goals/issues**

**We have developed various solution for our contribution towards UN goals.**

**Solution like:**

- **SDG 3 - We are helping the Government set up Tele-health services which are behind 'AragyaSetu', a mobile application developed by the Government of India to connect essential health services with the people of India in the fight against COVID-19. 'Health ATM', a digital health kiosk, has been developed by TechM to enable affordable healthcare for all. We have deployed 50+ Health ATMs across India and Africa. The Smart Health Kiosks allow automated health screening, live video-consultation with doctors, instant health reports and prescriptions, delivery of medicines, and help in managing and monitoring health on a mobile phone**
- **SDG 4 - Shikshaantar, our teacher capacity building programme helps ensure quality education at the foundation level for children. They work to**



constantly evaluate and introduce new teaching and learning methods and have better learning outcomes among children in primary schools

- **SDG 7 - Our 'Microgrid as a Solution' enables easy access to sustainable energy for communities. Our IoT-based solution 'Connected Solar Plants' can connect solar plants globally, and helps in forecasting production, monitoring substations, analysing real-time trends and graphs, auditing and reporting energy production. The plug-and-play device support sends timely alerts and notifications during critical events to avoid any inadvertent incidents.**
- **SDG 8 - Tech Mahindra Foundation's flagship education program ARISE (All Round Improvement in School Education) and a variant-ARISE+ (All Round Improvement in School Education for Children with Disabilities) ensure continuous improvement in grade-appropriateness and learning outcomes for the primary children**  
**The Foundation runs a SMART Centre in partnership with SOFIA an NGO in Delhi that investigates rehabilitating the women victims of domestic violence and helps them learn specialized skills to facilitate livelihood opportunities.**
- **SDG 9 - We foster innovation. Through secured and unsecured innovations in the Makers Lab, we are developing solutions and technologies that contribute to the 17 SDGs. GAIa, is our open source AI platform to solve business and environmental problems**
- **SDG 11 - Our tech-enabled solutions are focused on making cities and human settlements sustainable and safe. Our inhouse Smart Solutions like Smart Street Light, Smart Waste Management Systems, Smart Meter, and Smart Parking can be managed remotely through a smart city portal using unified monitoring and command centre (UMACC). Our Smart Building Management solutions help in managing energy, efficiently within buildings and help in reducing energy.**
- **SDG 13 - Developed by Tech Mahindra, #AI4Action is a global collaborative community of thinkers, tinkerers, innovators and researchers from educational institutes and corporations that is focused on finding solutions to tackle climate change. We leverage AI-powered ACUMOS to address the environmental challenges impacting the world. We also provide access to participants, so they can access, build, share and deploy their AI-powered applications to tackle climate changes.**

**Adopt and modify operating procedures to maximize contribution to UN goals/issues**

- **Transitioning traditional operations to clean energy and energy efficient equipment. We have increased our Renewable energy to 17.60% saving 23000 tons of CO<sub>2</sub>e annually. Through energy efficient equipment we have saved 5900 tons of CO<sub>2</sub>e**

- Replacing old technology and incandescent lamps with LED's. We have saved 6million units of electricity consumption by LED and motion sensors installation saving 4920MTCO<sub>2</sub>e emissions
- We have encouraged the use of Microsoft Teams, Tele-Presence, video conferencing, and virtual meetings through online platforms to
- minimize physical travel.
- Adopted low emission technology and eco-friendly products
- TechMighties are encouraged to use any of the 4 Ps – 'paidal' (walk), pedal (cycle), pool (carpool) or public transport – for their commute to and from work and thus reduce emissions.
- Installed flow restrictors, water sensors and installed STP's to reduce fresh water consumption

**Criterion 16: The COP describes strategic social investments and philanthropy Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy**

**Coordinate efforts with other organizations and initiatives to amplify—and not negate or unnecessarily duplicate—the efforts of other contributors**

**Education, Employability and Disability are the Foundation's direct beneficiary reach-out programmes that form the Tech Mahindra Foundation's (TMF) Corporate Social Responsibility (CSR) agenda. The strategies and operations driving these programmes at the Foundation are aligned with the basic principles of the United Nations Global Compact that advances the larger agenda of United Nations Sustainable Development Goals.**

**In the area of Education, providing universal elementary education through ARISE (All Round Improvement in School Education) schools under the Right of Children to Free and Compulsory Education (RTE) Act, 2009 is the larger vision. This is ensured by strengthening the capacity of the teachers through ITEIs (In-Service Teacher Education Institutes) that are run in collaboration with North Delhi Municipal Corporation and East Delhi Municipal Corporation under the 'Shikshaantar' programme. One of the flagship employability programmes-SMART (Skills for Market Training) through its 80+ partners aim at creating a skilled workforce by imparting high quality training in various vocational courses to young men and women from the urban rural communities. In the fields of training for the Healthcare and Digital Media sectors, the Foundation is creating a new benchmark through its SMART Academies now operational at Delhi, Chandigarh, Mumbai, and Vizag. Working with children and young adults to provide quality supportive education is one of the primary focus. Till date, the Foundation has positively impacted the lives of 4,50000+ beneficiaries through its various initiatives and programmes across India.**

**As part of its regular review process, the Foundation carries out impact assessments of its programmes through third-party consultants, at periodic intervals. The**

programmes at the Foundation operate with a basic belief of respecting the human rights of all and ensuring no kind of discrimination whether in terms of caste, class, labour and religion is meted out to the people associated with the Foundation.

**Criterion 17: The COP describes advocacy and public policy engagement**

**Publicly advocate the importance of action in relation to one or more UN goals/issues**

**Tech Mahindra is advocating on importance of action on various UN issues like:**

- 1) Support for the Women's Empowerment Principles - we welcome the provisions of the Women's Empowerment Principles – Equality Means Business, produced and disseminated by the United Nations Entity for Gender Equality and the Empowerment of Women (UN Women) and the United Nations Global Compact.**
- 2) Tech Mahindra has joined 155 global companies in calling for policies that will build resilience against future shocks by supporting efforts to hold global temperature rise to within 1.5°C above pre-industrial levels, in line with reaching net-zero emissions well before 2050. For details please refer at <https://www.mahindra.com/news-room/press-release/tech-mahindra-signs-un-global-compact-initiative-statement-on-climate-action>**
- 3) Tech Mahindra supports and promotes on climate action to reduce of carbon emissions. Please refer at <https://www.cnbc.com/video/2020/01/20/indian-tech-firm-shares-the-steps-its-taking-to-lower-carbon-emissions.html>**
- 4) Our CEO advocates importance of climate action through WEF Annual meeting on “Can sustainability & business profitability co-exist?”. Please find the details at <https://www.weforum.org/agenda/2020/01/sustainability-profitability-co-exist/>**

**Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues**

**Our CEO is part of various global summits to promote UN goals. He has joined ET SDG Impact Summit 2020 on promoting climate action with topic "Reimagining our Planet - Building Back Better" and discussed Role of 'Responsible Technology' in Sustainable Development. Our CSO has joined ET SDG impact summit on Making Carbon Matter: The road to decarbonization to promote SDG goal on Climate action. Tech Mahindra has been a Strategic Partner of WEF and part of various leadership conversations in the prestigious forum. Our MD & CEO Mr. CP Gurnani is part of Global AI Council as well as ICT Governor's Council spearheading various initiatives on AI, Connectivity, 4th Industrial Revolution and more. The leadership team has a regular presence at WEF Davos apart from engaging at other WEF events across the globe. Please find more details about our presence at Davos 2020 - <https://www.techmahindra.com/en-in/tech-mahindra-at-world-economic-forum-2020-davos>**

#### **Criterion 18: The COP describes partnerships and collective action**

**Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy**

**Our Collaborative approach to address some of the global challenges like health care, climate change, inequality etc. is accelerated by partnering with government, NITI Aayog and global organisation like UNGC, CDP etc. (as evidenced during the Covid-19 Crisis), industry, academia and thinkers (as in the case of climate action). Our Innovation across the globe is facilitated through Makers Labs (our R&D centres) and powered through partnership and collaboration ecosystem to develop sustainable and inclusive solutions for the future. We have partnered with University of Sydney where students are working on projects across areas like community development, sustainability, law, technology, farming, banking and health.**

**Our Partnerships work on the foundation of trust and is based on models that are scalable and sustainable in the long run. TMF works in partnership with 139 NGOs to create an atmosphere and ecosystem of collaboration, cross-learning, mutual benefit of partners and communities alike. The Foundation runs a SMART Centre in partnership with SOFIA an NGO in Delhi that looks into rehabilitating the women victims of domestic violence and helps them learn specialized skills to facilitate livelihood opportunities. Women are provided with educational training and welfare safety nets.**

**Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain**

**Tech Mahindra has collaborated with NITI Aayog's Women Entrepreneurship Platform (WEP) to support women entrepreneurs across the country. with NITI Aayog's Women Entrepreneurship Platform (WEP) to support women entrepreneurs across the country. Please refer at <https://www.mahindra.com/news-room/press-release/tech-mahindra-and-women-entrepreneurship-platform-niti-aayog-collaborate-to-support-women-entrepreneurs-across-the-country>. We are supporters and signatory to Caring for Climate, UNGC, together with UNEP & the secretariat of the UNFCCC, that helps shape engagement of businesses with climate change. Caring for Climate initiative mobilized a critical mass of business leaders to implement climate change solutions and help shape public policy.**

#### **Criterion 19: The COP describes CEO commitment and leadership**

**CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation**

**The CSR committee appointed by the Board reviews and guides Sustainability and climate strategy, major plans of action, risk management policies, budget plans as well as Sustainability performance of the company. Strategic integration of climate**

related risks with business is performed by the CSR committee which comprises of Board members and Managing Director & CEO of Tech Mahindra. The Managing Director & CEO is the chair of the CSR Committee and is responsible for the integration of sustainability and climate risks and opportunities into the overall corporate strategy. He reviews Sustainability performance, progress and implementation of Sustainability policies and initiatives and briefs the committee on Sustainability and climate-related agenda and performance of the company. The MD & CEO also conducts a formal review of the Sustainability Report. Tech Mahindra Sustainability council includes CFO, CPO, CSO, head of Legal and Corporate Services. They formulate Sustainability vision, strategy, and plan of action in alignment with the sustainability charter and roadmap of the company. The Chief Sustainability Officer (CSO), is responsible for overall implementation of climate change and sustainability strategy and initiatives; developing budgets and plans for sustainability and climate change. He reports to the Managing Director & CEO. He communicates the sustainability agenda to every function in the organisation and is ably supported by his team of sustainability managers and sustainability champions in implementing the same across the Company. For details please refer on page 36 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>

CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact

Tech Mahindra has announced its commitment to sustainability to drive business profitability. The company has undertaken a thoughtful and comprehensive program to reduce its absolute scopes 1 and 2 GHG (Greenhouse Gas) emissions 22% by 2030 and 50% by 2050, from a 2016 base-year. Tech Mahindra aims to leverage technology-enabled green solutions to tread on the path of responsible growth and is actively engaged in various Smart cities projects to undertake a modernization drive.

CP Gurnani, Managing Director and Chief Executive Officer, Tech Mahindra, said, “Sustainability is a long-term issue that will require decades of persistence. At Tech Mahindra, we are committed to pursuing plans that will have long-term impacts on the communities and will lead to a balance between sustainability and overall business profitability”. As a responsible business entity, Tech Mahindra concentrates on integrating sustainability into all aspects of the business and develops strategies for Environmental, Social and Governance (ESG) Governance. For details please refer at <https://www.cxoinsightme.com/news/tech-mahindra-commits-to-sustainability/>.

Tech Mahindra has joined 155 global companies in calling for policies that will build resilience against future shocks by supporting efforts to hold global temperature rise to within 1.5°C above pre-industrial levels, in line with reaching net-zero emissions well before 2050. The United Nations Global Compact has stated that the 155 signatories span across 34 sectors and have a combined market capitalization of more than \$2.4 trillion, representing 5 million employees. The business voices are

convened by the Science Based Targets initiative (SBTi) and its Business Ambition for 1.5°C campaign partners, the UN Global Compact and the We Mean Business coalition. According to our CEO we are committed towards building a sustainable business with responsibility and by creating value for our stakeholders, while also keeping in mind the long-term impacts on the environment. It's time to focus on and implement technology-led solutions that will help us reboot." For details please refer at <https://www.mahindra.com/news-room/press-release/tech-mahindra-signs-un-global-compact-initiative-statement-on-climate-action>

CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards

Our CEO promotes Sustainability initiatives and believes Sustainability and profit co-exists. By aligning our growth strategy as per the Science Based Targets and incorporating initiatives that focus on low carbon emissions, green campuses, energy conservation and renewable energy, we will continue to take a lead role in enabling shift of the global economy towards a sustainable future. According to him is the time to integrate sustainability with digital, which can take us closer to a green digital economy. The CEO promotes carpooling to reduce travel emissions. He has promoted Role of 'Responsible Technology' in Sustainable Development at SDG Impact Summit 2020. He has joined India CEO forum on Climate Change to promote:

- a) Integration of climate risks into investment decision making by accelerating resilience of our economies and financial systems
- b) Development of innovative public/private partnerships, tools and platforms to leverage Sustainable Solutions

Make sustainability criteria and UN Global Compact principles part of goals and incentive schemes for CEO and executive management team

Aspects such as bringing in cost optimization, customer and employee satisfaction, energy reduction projects and operational eco-efficiency impacting climate change are the important parameters of the CEO's Balance Score Card. In addition, our overall business strategy growth is largely due to solutions such as Smart city projects, SMART Grid, Micro-Grid-As-A-Service, Intelligent Electric Vehicle Charging System (IEVCS), Community Action Platform for Energy (CAPE), Energy Management System, Green Data Centers and Cloud-based services, which help reduce carbon footprints and achieve sustainability goals for our customers. Thus, the performance of these business portfolios and various climate initiatives are directly linked to the variable compensation of our MD & CEO, who is responsible for the business growth and margins of these business units. Our goal to achieve a 22% reduction in Scope 1-2 GHG Emissions by 2030 and 50% reduction by 2050. The yearly emission reduction towards achieving these goals are also a part of the CEO's BSC and thus incentivised. Our CFO is also responsible for business growth with sustainability solutions, operational eco-efficiency and bringing in cost

efficiency; the performance of green sustainability business portfolios is also linked to his variable compensation. The CSO aims towards and has targets for increasing Energy efficiency, energy reduction by adopting low carbon technology, Water and Waste management. The CSO's performance is measured on the achievement of TechM's sustainability goals and targets for the year. Sustainability goals include targets for GHG emission reductions, operational Eco-Efficiency, Water and Waste Management, Green Value Chain, Community, and Associate Development and training workshops. Tech Mahindra has signed UNGC's Business Ambition of 1.5 degree Celsius and our CSO strives towards achieving it by taking the Carbon Neutral targets.

**Criterion 20: The COP describes Board adoption and oversight**

Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance and Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.

The Board has an oversight of sustainability and climate change issues and receives regular update on climate change actions in the board meetings each quarter. The CSR committee appointed by the Board reviews and guides Sustainability and climate strategy, major plans of action, risk management policies, budget plans as well as Sustainability performance of the company. Strategic integration of climate related risks with business is performed by the CSR committee which comprises of Board members and Managing Director & CEO of Tech Mahindra. The Managing Director & CEO is the chair of the CSR Committee and is responsible for the integration of sustainability and climate risks and opportunities into the overall corporate strategy. He reviews Sustainability performance, progress and implementation of Sustainability policies and initiatives

Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress)

The Managing Director & CEO is the chair of the CSR Committee and is responsible for the integration of sustainability and climate risks and opportunities into the overall corporate strategy. He reviews Sustainability performance, progress and implementation of Sustainability policies and initiatives. The Chief Sustainability Officer (CSO), is responsible for overall implementation of climate change and sustainability strategy and initiatives; developing budgets and plans for sustainability and climate change. He reports to the Managing Director & CEO. He communicates the sustainability agenda to every function in the organisation and is ably supported by his team of sustainability managers and sustainability champions in implementing the same across the Company. He approves reporting on corporate sustainability initiatives.

## **Criterion 21: The COP describes stakeholder engagement**

**Publicly recognize responsibility for the company's impacts on internal and external stakeholders**

**TechM follows a robust process for engagement with both internal and external stakeholders. Our stakeholders include our customers, our employees, our investors & shareholders, partners & collaborators, academic institutions, government & local bodies, regulatory bodies, local communities & NGOs, suppliers & vendors, recruitment agencies, and society. Our Stakeholder Relationship Committee at the Board reviews employee, vendor and customer satisfaction survey reports, and oversees mechanism for addressing grievances and complaints. The committee also reviews environment, health and safety obligations of the company towards the stakeholders. We conduct formal and informal interactions with stakeholders to arrive at issues and impact perceived as critical by them. The internal stakeholders included representatives from key departments like investor relations, strategy, innovation, corporate services, customer services, human resources and governance. All issues/impacts that were deemed to be material were considered in the assessment process. These issues/impacts are then checked against business and strategy risks, environmental risks and people risk that provide opportunity to create or deplete value. For more details please refer on page 48-49 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>**

**Define sustainability strategies, goals and policies in consultation with key stakeholders**

**Stakeholders are those individuals, groups of individuals or organisations that affect and/or could be affected by our activities, solutions or services and associated performance. Engagement with the stakeholders helps us understand their explicit and tacit needs that inform our strategy and operational decisions. Inputs from stakeholders give us an insight into the future outlook and risks. We believe in engaging with all our stakeholder groups. We adopt various methods to ensure that we understand stakeholder's needs and concerns. Feedback received from our stakeholders is incorporated into decision making and corporate strategy. We develop organisation wide HR initiatives based on the needs of the associates gathered through annual employee surveys, and other digital engagement platforms and tools. We continuously tap into our alliance and partner ecosystem, exchange ideas, and receive inputs to develop future fit technology enabled solutions. With a powerful alliance ecosystem of leading technology firms and disruptive start-ups, we empower our business capabilities to deliver a comprehensive and customised solution package to the market. Our dedicated Alliance teams and partner management initiatives help our customers in their journey of digital transformation and to be current in the changing business environment. For details on goals and roadmap please refer on page 53-58 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>. For the**



terms of reference to the Stakeholders Relationship Committee, please refer on page 107 at <https://cache.techmahindra.com/static/img/pdf/Annual-Report.pdf>

**Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns**

**We follow a robust process for engagement with both internal and external stakeholders based on the need and context. Our stakeholders include our customers, our employees, our investors & shareholders, partners & collaborators, academic institutions, government & local bodies, regulatory bodies, local communities & NGOs, suppliers & vendors, recruitment agencies, and society. We adopt various methods to ensure that we understand stakeholder's needs and concerns. We also effectively work towards addressing these needs. The methods of engagement by category are enumerated in the table on page 45-46 at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>**

**\*Note: Please refer our Integrated Report 2020 which is according to IIRC framework, TCFD and CDSB framework and according to GRI standards which is externally assured by KPMG at <https://cache.techmahindra.com/static/img/pdf/integrated-report-20.pdf>. Please find the assurance statement on page 14-16 of the report. Our SDG report is available on page 17-19. The report is according to GRI standard, please refer on page 197-205 for GRI mapping index in the report**

#### **References:**

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