<u>UNGC Communication on Progress Report</u>

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 5.1 billion company with 1,45,000 + professionals across 90+ countries, helping over 1191 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 promise memorable and meaningful connected experiences for a world that's connected by purpose, people, and passion. We are part of the USD 21 billion Mahindra Group that employs more than 260,000 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 Mahindra Group has a clear focus on leading ESG globally, enabling rural prosperity and enhancing urban living, with a goal to drive positive change in the lives of communities and stakeholders to enable them to Rise.

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. Tech Mahindra's strategic partnership with the World Economic Forum fosters the rise of a new age of technologies that have the potential to overcome global challenges. The partnership aims to bring together people to drive and influence change and ensure that technology plays a key role in becoming the change maker. As a leading provider of digital transformation, Tech Mahindra continues to actively contribute to and collaborate with World Economic Forum across various platforms on themes such as AI, Sustainability, Quantum Computing, 5G, Digital, and the future of business.

TechM has a comprehensive environmental and climate change strategy and strong governance mechanism to implement policies to become Net Zero much before 2040. We have taken various initiatives to reduce our GHG emissions, water wastage and waste generation. Tech Mahindra has taken medium-term and long-term emission targets approved by SBTi (Science Based Targets initiative). We are signatory to Business Ambition for 1.5°C and 1.5°C Supply Chain Leaders. We have taken target to increase our Renewable Energy mix to 50% by 2025 and Zero Waste to Landfill certification for all our owned campuses. We have implemented internal Carbon Price of $9 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 enabling circular economy principles, air quality management, 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 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 key material issues by engaging with our stakeholders and have taken roadmap targets for the material issues for next 5 years till FY2026.

<u>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:</u>

Our UNGC CoP response is part of our Integrated Annual Report 2021 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 pdf page 56 at <u>annual-report-20-21.pdf (techmahindra.com)</u> This year we have published single Integrated Annual Report which is also our mainstream report. Our CEO supports UNGC's Women's Empowerment Principles and advancing equality. Our IAR 2021 is according to IIRC framework, comprehensive GRI standards, and TCFD and CDSB framework. As committed during our last CoP we have already aligned our report with SASB standards. During the next CoP, we will align our Integrated Annual Report with BRSR (Business responsibility and Sustainability Reporting) framework.

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.

<u>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):</u>

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 pdf page 196 at <u>annual-report-20-21.pdf (techmahindra.com)</u>

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. Environmentally and socially sustainable facility and infrastructure management will reduce our 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 device methods to motivate Employees for Green activities by Making Sustainability Personal. For more details on initiatives please refer on pdf page 181 at annual-report-20-21.pdf (techmahindra.com) 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 100 suppliers based on our annual market spend. They were assessed through a supply chain questionnaire. We have checked 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 pdf page 191-193 at annual-report-20-21.pdf (techmahindra.com)

Analyse 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 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 adhere to the Universal Declaration of Human Rights and Guiding Principles of Human Rights. 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 (UNGC) on Business and Human Rights in our relationships with our employees and suppliers.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. TechM is committed to uphold human rights guidelines, National/International laws (EU directives, ILO mandates, Modern Slavery Act etc.) within the geographies we operate, along with maintenance and improvement of systems and processes to avoid complicity in human right violations. 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.

Please find our Human Right policy at https://files.techmahindra.com/static/img/pdf/Humanrights-Policy.pdfThis 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)   While dealing with government, public bodies and non-profit organizations including their advisors, representatives, officials, politicians and political partiesTech 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.

<u>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:</u>

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.

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
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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).

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.
Please see attached 'Humanrights-Policy' & CEBC Policy document for more information at https://files.techmahindra.com/static/img/pdf/Humanrights-Policy.pdf
https://www.techmbs.in/images/pdf/cebc-policy.pdf

- Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties (BRE 1 + BRE 5 + ARE 1 + ARE 5)

  Yes, we have Human Rights & Code of Ethical Business Conduct polices & Modern Slavery Statement which is available in the public domain showing and a depicting our commitment towards human rights.

  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 Organizations specified to forced or compulsory labour.

  In pursuance of this, we published a 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.

Tech Mahindra's business is primarily Information Technology services. Its business is very client centric and focused. Tech Mahindra does not manufacture any significant products. Thus, Tech Mahindra is fully into B2B, rather than B2B business.

Tech Mahindra also does not have any specific supplier ecosystem. Any suppliers and partners which Tech Mahindra engages with are specific to client requirements. Most of the suppliers are global IT product suppliers. Tech Mahindra does obtain IT services and IT skilled resources from certain suppliers, but they work with Tech Mahindra and Tech Mahindra's clients' teams for developing client required software and IT solutions. Therefore, at Tech Mahindra, we do not have supply chain as such.

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 360-degree feedbacks and employee satisfaction surveys ("ESAT"). Thus, every employee can give feedback on his/ her Reporting Managers, respective department/ function, and organization. These feedbacks are taken on annual basis and are shared

with department/ function heads to be further disseminated. Departments/ functions are also rated based on 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. to ensure that employees work in conducive and exploitation-free environment.

Tracking is integrated into relevant internal reporting processes. Our Business might employ tools they already use in relation to other issues. This could include performance contracts and reviews as well as surveys and audits, using gender-disaggregated data where relevant. Operational-level grievance mechanisms can also provide important feedback on the effectiveness of our organization human rights due diligence from those directly affected."

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 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 oversees 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.

Please see attached https://files.techmahindra.com/static/img/pdf/Humanrights-Policy.pdf, 'https://www.techmbs.in/images/pdf/cebc-policy.pdf' and 'https://cache.techmahindra.com/static/img/pdf/Modern-Slavery-Statement.pdf.

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:

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. 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 (UNGC) on Business and Human Rights in our relationships with our employees and suppliers.

We conduct due diligence to identify and assess the nature of the actual and potential adverse human rights impacts with which our enterprise may be involved. The purpose is to understand the specific impacts on specific people, given a specific context of operations. Typically, this includes assessing the human rights context prior to a proposed business activity, where possible; identifying who may be affected; cataloguing the relevant human rights standards and issues; and projecting how the proposed activity and

associated business relationships could have adverse human rights impacts on those identified."

We assess risks related to Human Rights across the value chain. Employment contracts and policy documents go through periodic reviews to ensure that there are no human rights violations. This review is conducted across all our facilities globally. While reviewing such agreements and policies, significant effort and time are invested along with incidental costs needed for reviews. Such investments are periodic and proactive.

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.
An assessment of actual adverse impacts allows companies to take the required remedy measures, as well as to use the information gathered to analyze and assess human rights risks and the measures to address such risks that should be contemplated. Once an assessment of actual and potential adverse impacts has been performed, the company will be able to engage in human rights risk mapping, to assess and to prioritize the risks bearing on human rights. An analysis and consolidation of the mapping produced will provide a comprehensive mapping of the company's human rights risks.

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 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.

Please refer pdf page 138 at <u>Teach Mahindra IAR (2020-2021) and pdf page 24 at Sustainability Booklet (FY20-21)</u>

<u>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)</u>

The Tech Mahindra Whistle-blower Policy is a critical means through which Stakeholders can raise actual or suspected violations towards remediation of Human Right impacts. Whistle-blower 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 Whistle-blower, please refer on page 4-5 at <u>Whistleblower Policy</u>

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 Whistle-blower Policy encourages employees to report non-compliance with relative anonymity. Carrying this forward, we have a platform called FreeVoice 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 can give feedback on his/ her Reporting Managers, respective department/ function, and organization. These feedbacks are taken on annual basis and are shared with department/ function heads to be further disseminated. Departments/ functions are also rated based on 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. 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 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 oversees 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. 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.

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: -

Timelines	Action
1. Beyond 30 days	E-mail warning
2. Beyond 60 days	Warning letter + InCit record in Ide@s
3. Beyond 90 days	

De-allocation from project / assignment (POSH) Disciplinary action including suspension / Termination (CEBC)

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.

Process and programs in place to support human rights through core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and/or other forms of collective action (BRE 6 + ARE 6)

We have programs in place to ensure that human rights are upheld and supported as per international standards. Such programs and principles are part and parcel of day-to-day

business such as strategic philanthropic investment, public policy engagement, core business and other collective actions.

Tech Mahindra contribute to the wellbeing of the societies in which we operate through our business activities. We will maintain the highest level of integrity while respecting local laws, customs, and traditions. We work with community and other organizations to support non-profit making activities and activities that benefit wider society.

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. For more details please refer to https://files.techmahindra.com/static/img/pdf/Humanrights-Policy.pdf

Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration
Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfil this criterion, including goals, timelines, metrics, and responsible staff

We conduct due diligence to identify and assess the nature of the actual and potential adverse human rights impacts with which our enterprise may be involved. The purpose is to understand the specific impacts on specific people, given a specific context of operations. Typically, this includes assessing the human rights context prior to a proposed business activity, where possible; identifying who may be affected; cataloguing the relevant human rights standards and issues; and projecting how the proposed activity and associated business relationships could have adverse human rights impacts on those identified."

Tracking is integrated into our relevant internal reporting processes. Our Business might employ tools they already use in relation to other issues. This could include performance contracts and reviews as well as surveys and audits, using gender-disaggregated data where relevant. Operational-level grievance mechanisms can also provide important feedback on the effectiveness of our organization human rights due diligence from those directly affected.

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

The Human Rights policy of the Company is to cultivate a global network of collaborative and mutually beneficial alliances after carrying out due diligence of all prospective partners. We respect partners' customs and traditions and be honest and

ethical in our dealings. We work with partners in the creation of successful ventures with high standards of integrity and business practice. We use our values and principles in dialogue with other organizations and in considering new and existing relationships. Please refer for more details on pdf page 137 at https://insights.techmahindra.com/investors/annual-report-20-21.pdf

-System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain (BRE3 + ARE3)

TechM conducts trainings to strengthen in-house awareness and education on the practice of human rights. TechM believes that an empowered workforce is the best way to receive feedback and identify improvement areas. Tech Mahindra's Whistle-blower Policy is a critical means through which stakeholders can raise actual or suspected violations. The Corporate Ombudsman oversees investigative procedures laid down and defined under the Whistle blower policy
We conduct due diligence to identify and assess the nature of the actual and potential adverse human rights impacts with which our enterprise may be involved. The purpose is to understand the specific impacts on specific people, given a specific context of operations. Typically, this includes assessing the human rights context prior to a proposed business activity, where possible; identifying who may be affected; cataloguing the relevant human rights standards and issues; and projecting how the proposed activity and associated business relationships could have adverse human rights impacts on those identified."

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. Please refer details on page 24 at Sustainability Booklet (FY20-21)

Monitoring draws from internal and external feedback, including affected stakeholders

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.
We also assess risks related to Human Rights across the value chain. Employment contracts and policy documents go through periodic reviews to ensure that there are no human rights violations. This review is conducted across all our facilities globally. While reviewing such agreements and policies, significant effort and time are invested along with incidental costs needed for reviews. Such investments are periodic and proactive. 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.
An assessment of actual adverse impacts allows companies to take the required remedy measures, as well as to use the information gathered to analyze and assess human rights risks and the measures to address such risks that should be contemplated. Once an assessment of actual and potential adverse impacts has been performed, the company will

be able to engage in human rights risk mapping, to assess and to prioritize the risks bearing on human rights. An analysis and consolidation of the mapping produced will provide a comprehensive mapping of the company's human rights risks. Please refer page 24 at Sustainability Booklet (FY20-21)

- Leadership review of monitoring and improvement results

Yes, Tech Mahindra along with the help of Corporate Ombudsman reports such violation to senior management and board of directors based on the review and recommendation of new processes and procedures are 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.

CORPORATE OMBUDSMAN:

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

WHISTLE BLOWER:

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. Please refer for details at CEBC Policy and, Whistleblower Policy

- <u>Process to deal with incidents the company has caused or contributed to for internal and external stakeholders (BRE 4 + ARE 4)</u>

Yes, Tech Mahindra, there is an internal process through which such incidents and concerns are raised. This can be done via email, phone and verbal reports and any other source as convenient for the employee to the Corporate Ombudsman. The Corporate Ombudsman will be addressing and investigating this to ensure fairness and human rights are upheld.

All our significant employment contracts, investments agreements within Tech Mahindra and all our acquired companies undergo human rights screening to ensure that there are no human rights violations. We follow a robust due diligence process and significant time and effort are invested to ensure that there are no risks due to any human rights violations.

We assess risks related to Human Rights across the value chain. Employment contracts and policy documents go through periodic reviews to ensure that there are no human rights violations. This review is conducted across all our facilities globally. While reviewing such agreements and policies, significant effort and time are invested along with incidental costs needed for reviews. Such investments are periodic and proactive.

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 oversees 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:

a. Sending an e-mail
b. 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.

Please see attached 'Modern-Slavery-Statement' and 'Code-Of-Ethical-Business-Conduct' document for more information.

<u>Labour Management Policies & Procedures</u>

<u>Criterion 6: The COP describes robust commitments, strategies, or policies around labour</u>

<u>Structural engagement with a global union, possibly via a Global Framework Agreement</u>

TechM is committed to uphold human rights guidelines, National/International laws (EU directives, ILO mandates, Modern Slavery Act etc.) within the geographies we operate, along with maintenance and improvement of systems and processes to avoid complicity in human right violations. We conduct due diligence 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 Code of Ethical Business Conduct (https://insights.techmahindra.com/investors/CodeOf-Ethical-Business-Conduct.pdf) is the umbrella policy and Tech Mahindra's Human Rights Policy is overseen by Board of Directors, including the Chief Executive Officer.

Tech Mahindra also follows the Business Responsibility and Sustainability Reporting Policy (BRSR) that provides guidance to businesses on what constitutes responsible business conduct (https://files.techmahindra.com/static/img/pdf/Tech-Mahindra-BR-Policy.pdf). The BRSR policy follow the principles based on the National Guidelines on Responsible Business Conduct (NGRBC) which captures key national and international developments in the sustainable development agenda and business responsibility field.

Our Business Practices are governed by the guiding principles of NGRBC which comprises nine thematic pillars of business responsibility that are known Principles. These principles are interdependent, interrelated, and non-divisible and all business are urged to address them holistically.

Principle 3 states that Businesses should respect and promote the well-being of all employees, including those in their value chains. This Principle encompasses all policies and practices relating to the equity, dignity and well-being and provision of decent work (as indicated in SDG 8- Decent Work and Economic Growth - Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all), of all employees engaged within a business or in its value chain, without any discrimination and in a way that promotes diversity. The principle recognizes that the well-being of an employee also includes the wellbeing of her/his family.

<u>Participation and leadership by employers' organizations (international and national) to jointly address challenges related to labour standards in the countries of operation, possibly in a tripartite approach (business – trade union – government).</u>

One of Tech Mahindra's core values is 'Dignity of an Individual' through which we affirm that we will value individual dignity, uphold the right to express disagreement and respect the time and efforts of others.

Tech Mahindra recognizes the right to freedom of association through independent Trade Unions, Work Councils (WCs) or Collective Bargaining Agreements (CBAs) which includes and follows all aspects of labour standards are followed as per the regional laws

where we operate. Although our associates are not part of any trade Unions in India, there are readily available internal tools for associates to share their views, opinions and ideas across managerial levels and the organization. TechM provides policies, forums and support groups for hearing and addressing the concerns of its associates and resolving their issues or conflicts in a timely, fair, and transparent manner.

In each location where Tech Mahindra operates, it complies with local laws governing the employment relationship including labour standards. In regions like continental Europe, associates need to be a part of work councils or collective bargaining agreements which again ensure that these standards are stringently met. Tech Mahindra follows the local rules and regulations in the country of our operations and adheres to these collective bargaining agreements where applicable.

https://insights.techmahindra.com/investors/annual-report-20-21.pdf

Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation

Tech Mahindra follows the Business Responsibility and Sustainability Reporting Policy (BRSR) that provides guidance to businesses on what constitutes responsible business conduct (https://files.techmahindra.com/static/img/pdf/Tech-Mahindra-BR-Policy.pdf). The BRSR policy follow the principles based on the National Guidelines on Responsible Business Conduct (NGRBC) which captures key national and international developments in the sustainable development agenda and business responsibility field. Some of the key drivers of the NGRBC are
1. The UN Guiding Principles for Business and Human Rights (UNGPs)
2. UN Sustainable Development Goals (SDGs)
3. Paris Agreement on Climate Change (2015)
4. Core Conventions 138 and 182 on Child Labour by the International Labour Organization (ILO)
5. Annual Business Responsibility Reports (ABRRs)
6. Indian Companies' Act 2013

Our Business Practices are governed by the guiding principles of NGRBC which comprises nine thematic pillars of business responsibility that are known Principles. These principles are interdependent, interrelated, and non-divisible and all business are urged to address them holistically.

Principle 3 of the BRSR states that Businesses should respect and promote the well-being of all employees, including those in their value chains. This Principle encompasses all policies and practices relating to the equity, dignity and well-being and provision of decent work (as indicated in SDG 8- Decent Work and Economic Growth - Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all), of all employees engaged within a business or in its value chain, without any discrimination and in a way that promotes diversity. The principle recognizes that the well-being of an employee also includes the wellbeing of her/his family.

We exhibit zero tolerance towards all facets of modern slavery or forced and compulsory labour in our supply chain or in any part of our organization, as elaborated under the Modern Slavery Act, 2015, Commonwealth Modern Slavery Act, 2018, the UN Declaration of Human Rights and the conventions of the International Labour Organization. In pursuance of this, we publish a public statement elucidating the initiatives undertaken to eradicate the slavery and/ or human trafficking from our supply chain or in any part of our organization.

<u>Inclusion of reference to the principles contained in the relevant international labour standards in contracts with suppliers and other relevant business partners</u>

Tech Mahindra has a Sustainable Supply Chain Management (SSCM) Code of Conduct which applies to all the suppliers, vendors, contractors, and companies who provide Tech Mahindra with products and services and is included in their contracts with Tech Mahindra.

We expect them to abide by and ensure continuous improvements in 1. Ethical business practices 2. Management practices that respect the rights of all employees and the local community 3. Privacy and Data protection 4. Prohibited business practices as per law of the land 5. Minimizing impact on the environment 6. Providing a safe and healthy workplace.

TechM engages with suppliers who share our commitment to human rights and fair employment practices in accordance with existing international standards such as the: 1. UN Universal Declaration of Human Rights, 2. International Covenant on Civil and Political Rights, 3. ILO Declaration on Fundamental Rights at Work, and 4. UN Convention on the Rights of the Child. 5. Modern Slavery Act, 2015 and Modern Slavery Act 2018 (Cth)

<u>Written company policy to obey national labour law, respect principles of relevant international labour standards in worldwide company operations and engage in dialogue with representative organization of the workers (international, sectoral, national)</u>

The Tech Mahindra Human Rights policy (https://files.techmahindra.com/static/img/pdf/Humanrights-Policy.pdf) available on our website clearly states that TechM is committed to uphold human rights guidelines, National/International laws (EU directives, ILO mandates, Modern Slavery Act etc.) within the geographies we operate, along with maintenance and improvement of systems and processes to avoid complicity in human right violations. We conduct due diligence 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 Code of Ethical Business Conduct (https://insights.techmahindra.com/investors/CodeOf-Ethical-Business-Conduct.pdf) is

the umbrella policy and Tech Mahindra's Human Rights Policy is overseen by Board of Directors, including the Chief Executive Officer.

<u>Reflection on the relevance of the labour principles for the company</u>

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 on Business and Human Rights in our relationships with our employees and suppliers. Our aim is to help increase the enjoyment of human rights within the communities in which we operate. The Company is committed to compliance with the requirements of all applicable employment, labor, and human rights laws to ensure fair and ethical employment practices are followed.

<u>Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies</u>

1) The Human Rights Policy https://files.techmahindra.com/static/img/pdf/Humanrights-Policy.pdf specifies the "Human Rights Policy" of Tech Mahindra Ltd., its Subsidiaries and Joint Ventures. Respect for Human rights is a fundamental value of Tech Mahindra. We strive to respect and promote human rights across all our global sites, in accordance with the UN Guiding Principles (UNGC) on Business and Human Rights in our relationships with our stakeholders. TechM is committed to uphold human rights guidelines, National/International laws (EU directives, ILO mandates, Modern Slavery Act etc.) within the geographies we operate, along with maintenance and improvement of systems and processes to avoid complicity in human right violations.

2) The Business Responsibility and Sustainability Reporting Policy https://files.techmahindra.com/static/img/pdf/Tech-Mahindra-BR-Policy.pdf captures key national and international developments in the sustainable development agenda and business responsibility field. Some of the key drivers of the NGRBC are given below 1. The UN Guiding Principles for Business and Human Rights (UNGPs) 2. UN Sustainable Development Goals (SDGs) 3. Paris Agreement on Climate Change (2015) 4. Core Conventions 138 and 182 on Child Labour by the International Labour Organization (ILO) 5. Annual Business Responsibility Reports (ABRRs) 6. Companies' Act 2013

3) The Tech Mahindra SSCM Supplier Code of Conduct https://files.techmahindra.com/static/img/pdf/SSCM-Supplier-Code-Of-Conduct.pdf ensures that TechM engages with suppliers who share our commitment to human rights and fair employment practices in accordance with existing international standards such as the: 1. UN Universal Declaration of Human Rights, 2. International Covenant on Civil and Political Rights, 3. ILO Declaration on Fundamental Rights at Work, and 4. UN Convention on the Rights of the Child. 5. Modern Slavery Act, 2015 and Modern Slavery Act 2018 (Cth)

Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff

> Tech Mahindra already has strong policies on Human Rights including Labour aspects which is publicly available. Our policies and procedures ensure prevention of human rights violations like employment of child labour, and freedom of association for the employees, across the supply chain as well.
> https://files.techmahindra.com/static/img/pdf/Humanrights-Policy.pdf
> https://files.techmahindra.com/static/img/pdf/Tech-Mahindra-BR-Policy.pdf
>
> We exhibit zero tolerance towards all facets of modern slavery or forced and compulsory labour in our supply chain or in any part of our organization, as elaborated under the Modern Slavery Act, 2015, Commonwealth Modern Slavery Act, 2018, the UN Declaration of Human Rights and the conventions of the International Labour Organization. In pursuance of this, we publish a public statement elucidating the initiatives undertaken to eradicate the slavery and/ or human trafficking from our supply chain or in any part of our organization.
> https://insights.techmahindra.com/investors/Modern-Slavery-Statement.pdf
>
> We undergo third party HR assessment of our owned locations and have a target to ensure the assessment at all our owned locations by Fy26.
> We are also transparent in reporting the number of complaints relating to child labour, forced labour, involuntary labour in our Integrated Annual report
> https://insights.techmahindra.com/investors/annual-report-20-21.pdf

Criterion 7: The COP describes effective management systems to integrate the labour principles

Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed, and operated in line with the representative organization of workers

> Complaints can be raised as per the Whistle-Blower Policy
> https://insights.techmahindra.com/investors/WhistleBlower_Policy.pdf . There is a structured process to deal with corruption incidents. The Corporate Ombudsman ascertains the credibility of the charge. If initial enquiry indicates further investigation is required, a Redressal Committee is appointed to investigate into the complaints within 48 working hours of receipt of the whistle-blower complaint. The Whistle-Blower Policy has a provision to ensure that no one suffers any detrimental treatment because of refusal to take part in corruption, or because of reporting concerns under this policy in good faith. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern. There is a Reward and Recognition programme to encourage and implement Anti-Corruption and Bribery policy across the organization.

<u>Active engagement with suppliers to address labour-related challenges</u>

Responsible and sustainable supply chain is an organizational priority. The company engages with them on key elements of quality, timeliness, sustainability performance and the supplier risk management and business continuity management through capacity building, audits, trainings, and awards. We engage with our suppliers and support them in building their capabilities on sustainable practices and business ethics. We have audited and assessed 100+ key suppliers on ESG aspects till FY21. We raise awareness about labour related challenges with our key suppliers through Capacity Building Workshops and webinars https://files.techmahindra.com/static/img/pdf/scm-capacity-building-workshop.pdf

https://insights.techmahindra.com/investors/annual-report-20-21.pdf

<u>Internal awareness-raising and training on the labour principles for management and employees</u>

We uphold our commitment to human rights as a member of the United Nations Global Compact. Some of our key global policies are publicly available to show how we drive ethics and human rights within our organisation. These include Diversity and Inclusion, Code of Ethical Business Conduct, Anti-Corruption and Bribery Policy and Human Rights. They cover all associates, suppliers, clients, communities, and countries across geographies where we do business. Our associates are informed about their rights and responsibilities regularly through trainings, mailers, and internal platforms. We have created specific interventions to tackle these issues.

We have mandatory training for all associates on all aspects of code of ethical business conduct which includes labour aspects also. 100% of our associates must complete these trainings within 3 months of their Onboarding. The training material is found on our website https://insights.techmahindra.com/investors/CEBC-Training-Material.pdf

<u>Allocation of responsibilities and accountability within the organization</u>

The Board of Directors has overall responsibility for ensuring that the HR 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. Corporate Ombudsman provides quarterly reports to the Board of Directors, the CEO and Head – HR. Corrective measures, including policy and process changes as recommended by the Leadership Team, are implemented by Compliance Team.

<u>Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards</u>

Tech Mahindra recognizes the right to freedom of association and encourages associates to connect, discuss ideas and raise issues through internal tools and platforms. Although our associates are not part of any trade Unions in India, there are readily available internal tools for associates to share their views, opinions and ideas across managerial levels and the organization. Tech Mahindra follows the local rules and regulations in the country of our operations and adheres to these collective bargaining agreements in European countries where applicable. Tech Mahindra adheres to the local practices and some of our associates are covered by the independent trade union or collective bargaining agreements in few of the European countries. Here our employees are members of the Works Council set up in accordance with local laws which takes part in the majority of operations related to employees at the location, such as hiring and exit, terms and conditions of their employment, agreements, etc. these memberships are confidential and not disclosed by the associates.

But even without being part of a union, every Tech Mahindra employee has readily available access to many internal tools to connect with the senior management. We have Free Voice (a platform to share views on policies, practices, and culture within the company), CARE (Connect with Associates and Resolve with Engagement) and IRIS (Idea bank) where employees can share their views, opinions, and ideas across managerial levels and the organization. Tech Mahindra encourages transparency across its workforce and directly helps connect with leaders and their vision through events like All-Hands meet and Coffee with Leaders where Senior Management leaders interact, discuss and exchange ideas on myriad issues including Company strategy and goals. The employees can also directly connect with the leaders through online
https://insights.techmahindra.com/investors/annual-report-20-21.pdf

Risk and impact assessments in labour

TechM has aligned strategies/operations with UNGC principles derived from Human rights- Universal Declaration of Human Rights; Labor- International Labor Organization's declaration on fundamental principles & rights at work.

Respect for Human rights is a fundamental value for Tech Mahindra. We strive to respect and promote human rights across all our global sites, in accordance with the UN Guiding Principles (UNGC) on Business and Human Rights in our relationships with associates, partners, suppliers and other stakeholders. The company is committed to protecting and respecting Human Rights and remedying human rights violations in case they are identified.

We are assessed by a third party auditor on our HR policies which also includes labour aspects.

https://insights.techmahindra.com/investors/annual-report-20-21.pdf

Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Tech Mahindra already has strong policies on Human Rights including Labour aspects which is publicly available. Our policies and procedures ensure prevention of human rights violations like employment of child labour, and freedom of association for the employees, across the supply chain as well.
https://files.techmahindra.com/static/img/pdf/Humanrights-Policy.pdf
https://files.techmahindra.com/static/img/pdf/Tech-Mahindra-BR-Policy.pdf

We exhibit zero tolerance towards all facets of modern slavery or forced and compulsory labour in our supply chain or in any part of our organisation, as elaborated under the Modern Slavery Act, 2015, Commonwealth Modern Slavery Act, 2018, the UN Declaration of Human Rights and the conventions of the International Labour Organisation. In pursuance of this, we publish a public statement elucidating the initiatives undertaken to eradicate the slavery and/ or human trafficking from our supply chain or in any part of our organisation.
https://insights.techmahindra.com/investors/Modern-Slavery-Statement.pdf

We undergo third party HR assessment of our owned locations and have a target to ensure the assessment at all our owned locations by Fy26.
We are also transparent in reporting the number of complaints relating to child labour, forced labour, involuntary labour in our Integrated Annual report
https://insights.techmahindra.com/investors/annual-report-20-21.pdf

Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration

Outcomes of integration of the Labour principles

One of our core values is 'Dignity of an Individual' through which we affirm that we will value individual dignity, uphold the right to express disagreement and respect the time and efforts of others. We exhibit zero tolerance towards all facets of modern slavery or forced and compulsory labour in our supply chain or in any part of our organisation, as elaborated under the Modern Slavery Act, 2015, Commonwealth Modern Slavery Act, 2018, the UN Declaration of Human Rights and the conventions of the International Labour Organisation.

We are a transparent organisation with strong policies that reflect our stand on Human Rights, Ethical Business Conduct and Labour practices among others. These policies ensure that all our associates are part of our core values, and culture and are also aware of their rights as an employee of the organisation. We have platforms like CARE, Freevoice and Social Media to listen to the voice of internal stakeholders. The Freevoice platform for sharing observations, complaints and suggestions anonymously, gives voice to associate concerns for psychological safety. Apart from this, an internal Social Media team actively monitors the TechM brand on different social media channels and brings to notice issues or concerns with the HR team for action. These aspects of the company that

ensure we have an empowered workforce, who enjoy a stress-free and respected work life and tend to stay back in the organisation long-term.

<u>Process to positively engage with the suppliers to address the challenges (i.e., partnership approach instead of corrective approach) through schemes to improve workplace practices</u>

We conduct Capacity building workshops for our key suppliers https://files.techmahindra.com/static/img/pdf/scm-capacity-building-workshop.pdf to help them understand the importance of Sustainable Development goals, Sustainable Practices and to create a platform for all stakeholders to discuss their concerns and challenges. We have conducted Capacity Building Workshops for more than 150 key suppliers till now. The main topics covered in the capacity building workshop included: Sustainability in the value chain Supply Chain Code of Conduct for Suppliers Environmental Stewardship Conservation of Resources Reduction of Carbon Footprint Financial Savings and Viability Social and Ethical Responsibility To incentivise our Suppliers for Sustainability practices, we felicitate top two suppliers with the 'Tech Mahindra Supplier Sustainability Award'. We encourage our suppliers to identify key material issues and risks for their businesses including climate change and behavioural risks. We assess their policy documents to ensure they follow the minimum standards and regulatory compliances. TechM engages with suppliers who are committed to maintaining and improving their work environment so that it is safe and healthy for all staff, contractors, and visitors, with policies and programmes that go beyond legislated requirements.

We are actively working with suppliers and vendors to support them in carbon reduction and enabling our value chain to mitigate and manage risks posed by the supply chain to our business operations. We also ensure that all our suppliers and partners adhere to green guidelines and adopt sustainable practices.

<u>Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labour standards</u>

We enable supply chain responsibility through a 3-step process which includes supplier audits (both questionnaire-based as well as on-site inspections) and assessments, supplier capacity building and supplier continuous improvement programmes on climate risk evaluation.
Supplier assessments help us understand the potential ESG (Environmental, Social and Governance) risks within the Supply Chain. We actively monitor suppliers to ensure no child or forced labourers. We encourage our suppliers to track and reduce their GHG emissions. We engaged with the top 100 key suppliers based on our annual market spend until now. They were assessed through a supply chain questionnaire, which checked regulatory compliances with various aspects on ethical business conduct and sustainability practices laid out in our SSCM Policy. We chose suppliers representing different locations, category of suppliers and the total annual spend for on-site audits last year. The key mandate during the audit is on compliance and measures taken to account for and to reduce GHG emissions. The observations, findings, recommendations and

feedback of the assessment are shared with the suppliers to drive continuous improvement programmes.

Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future

TechM associates are always included in our discussions for the betterment of the organisation. We believe that 'Water cooler' moments are important because they connect people on an emotional level. During the pandemic, we created virtual 'water-cooler' moments through social connects like AHMs with CEO, Team Tea Meetings, Lockdown Contests, Location eConnects, an inspirational talk show called PrimeTime etc. along with events for the family like Virtual Summer Camps and other activities. Communication tools like TechM Coronicles newsletter and the COVID-19 microsite helped associates remain connected.

TechMighties Rise every day to drive positive change in the lives of stakeholders. In recognition of their efforts, we offer them the 'Freedom to Explore', so they can experiment and embrace new opportunities to Connect, Co-create & Celebrate. This "Freedom to Explore" is the employee value proposition that we offer our associates.

CONNECT: Provide early leadership opportunities and learning avenues that connect associates' aspirations to achievements.

CO-CREATE: Foster a culture of co-creation by encouraging associates to do new things and new ways of doing old things to drive positive change.

CELEBRATE: Make celebrations a way of life to seamlessly blend life and work and celebrate each moment.

System to track and measure performance based on standardized performance metrics

The Performance management process has been designed to ensure open communication between the Manager and the associates at all stages. The entire performance management lifecycle is digitised through our Ide@s (Individual Development Enabling Appraisal System) application which is used as a centralised system for the execution, tracking and maintenance of the performance management process. The platform uses auto-escalation mechanism to enforce the adherence of timelines for performance evaluation with negligible overruns.

We have a structured performance appraisal process that includes a mid-term and annual review. In addition to an assessment based on measurable yearly goals and targets, there is a 180-degree feedback system where associates are appraised by their managers & unit heads, peers (not mandatory) and the external clients/customers and comparative rating within the associate category.

There is a three-point rating scale with 'Excellent' (exceeds expectations, henceforth called X-raters), 'Consistent' (consistently meeting expectations) and 'Lagging' for those whose performance is unsatisfactory.

In both Mid-Term and Annual Appraisal, associates have the opportunity to make their career aspirations known to their Managers and create a Competency Development Plan to identify specific learning opportunities to move towards their career goal. These career aspirations are captured online in the Ide@s platform and are shared with internal teams to use as inputs during training allocation, project allocations, and onsite opportunities.

As a tech company, changes in the Reporting Manager are common. In order to ensure that the feedback of all the Managers with whom the Associate has worked during the year, there is a Manager Change feedback functionality that solicits real-time feedback from the departing Manager as a reference point for the new Manager during Annual or Mid-term Appraisals discussions.

A promotion to higher roles is a part of the annual performance review. It is based on the performance and potential rather than seniority. It is decided through a promotion eligibility grid (considering factors of past performance ratings, tenure in the grade etc.) and Promotion Review Committee's (PRC) assessment of the candidate on the competencies essential for the role.

Through the Reverse Feedback process, we ensure that appraisal is a two-way process giving associates the ability to assess their Managers and share the feedback directly with their skip-level Managers. We have a robust Grievance Redressal process in place to handle any cases where associates believe they have been treated unfairly and maintain a buffer of 1% pay-out to handle these cases.
https://insights.techmahindra.com/investors/annual-report-20-21.pdf

Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff

Tech Mahindra already has strong policies on Human Rights including Labour aspects which is publicly available. Our policies and procedures ensure prevention of human rights violations like employment of child labour, and freedom of association for the employees, across the supply chain as well.

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https://files.techmahindra.com/static/img/pdf/Tech-Mahindra-BR-Policy.pdf

We exhibit zero tolerance towards all facets of modern slavery or forced and compulsory labour in our supply chain or in any part of our organisation, as elaborated under the Modern Slavery Act, 2015, Commonwealth Modern Slavery Act, 2018, the UN Declaration of Human Rights and the conventions of the International Labour Organisation. In pursuance of this, we publish a public statement elucidating the initiatives undertaken to eradicate the slavery and/ or human trafficking from our supply chain or in any part of our organisation.
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We undergo third party HR assessment of our owned locations and have a target to ensure the assessment at all our owned locations by Fy26.
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https://insights.techmahindra.com/investors/annual-report-20-21.pdf

Robust Environmental Management Policies & Procedures
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://files.techmahindra.com/static/img/pdf/statement-of-ghg-assurance-fy-2020-21.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 Annual Report 2021 which is externally assured by KPMG is according to IIRC and TCFD framework and comprehensive GRI standards. Tech Mahindra has taken medium-term and long-term emission targets approved by SBTi (Science Based Targets initiative). We are signatory to Business Ambition for 1.5°C and 1.5°C Supply Chain 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 also taken target of ZWL (ZERO Waste to Landfill) certification for all our owned facilities. We have voluntarily implemented an internal Carbon Price of $9 per ton of CO_2e to boost our Green Investment moving towards Net Zero.

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 pdf page 74 at https://insights.techmahindra.com/investors/annual-report-20-21.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 GHG 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 mix from 1.77% in our baseline year FY16 to 21.2% in FY21. Through renewable energy we have saved 23,031,946 kWh (equal to 70,000 average households in India) reducing 18,900 MTCO2e of emissions. We have installed Solar plants of capacity 3,830 kWp at our 11 campuses in Pune, Bengaluru, Hyderabad, Chandigarh, Noida, Vizag, Bhubaneshwar, and Chennai and PPA of capacity 10 MW at Bengaluru. We are procuring Renewable Energy of 750 kWp from Biomass at our Chennai location. We also procured renewable energy of capacity 387 kWp at onsite location in Waterford. The energy savings also includes our emission savings of 223,380 kWh from Solar water heater of varying capacities of 2,500, 5,000, 8,000 and 10,000 liters at Bengaluru, Hyderabad, Chandigarh, and Pune facilities. 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 intelligent 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 lifecycle 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), Eco Vadis, FTSE (Financial Times Stock Exchange), etc. We aim to reduce environmental impacts throughout the lifecycle 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 diesel (HSD) from backup Generators and emissions from refrigerants. The Scope 2 emissions are from the electricity purchased from the grid across the globe including owned and leased operations including Data Centres. Our Energy consumption which is not included in Scope 2 and which is used for our leased location (not in our control) at some of the facilities are accounted in Scope 3 and it is non-renewable source of energy. This is based on estimation of per USD cost and unit consumption. Also, this year due to pandemic most of our associates are Working from Home. So, we have calculated their energy consumption on basis of use of laptops and desktops considering their Voltage and Ampere used for number of working hours. We have accounted emissions of this energy consumption outside the organisation under upstream leased assets. Our Scope 3 emission includes Business Travel, Employee Commute, Upstream Leased Assets, 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 Annual report 2021 for more details on scope 1,2 &3 from pdf page 170-175 at: https://insights.techmahindra.com/investors/annual-report-20-21.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 pdf page 191 on responsible supply chain at https://insights.techmahindra.com/investors/annual-report-20-21.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 pdf page 83 at https://insights.techmahindra.com/investors/annual-report-20-21.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 pdf page 61-63 at https://insights.techmahindra.com/investors/annual-report-20-21.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 pdf page 181-185 at https://insights.techmahindra.com/investors/annual-report-20-21.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. FreeVoice

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 device methods to motivate Employees for Green activities by Making Sustainability Personal.

<u>Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship:</u>

<u>System to track and measure performance based on standardised performance metrics:</u>

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 pdf page 74 at https://insights.techmahindra.com/investors/annual-report-20-21.pdf. We measure and monitor the impact according to GRI standards and material issues identified and disclosed in our Integrated Annual Report which is externally assured by third party KPMG on pdf page 56 at https://insights.techmahindra.com/investors/annual-report-20-21.pdf

<u>Leadership review of monitoring and improvement results:</u>

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), Eco

Vadis, 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, analysing 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 pdf page 126-127 at https://insights.techmahindra.com/investors/annual-report-20-21.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 pdf page no 191-195 of Tech Mahindra Integrated Annual report 2021: https://insights.techmahindra.com/investors/annual-report-20-21.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 pdf page 56 at https://insights.techmahindra.com/investors/annual-report-20-21.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).

Robust Anti-Corruption Management Policies & Procedures

Criterion 12: The COP describes robust commitments, strategies, or policies in anti-corruption Policy on anti-corruption regarding business partners (D5)

The Anti Bribery and Corruption policy of Tech Mahindra (https://insights.techmahindra.com/investors/Anti-Corruption-and-Bribery-Policy.pdf) applies to all individuals working for Tech Mahindra Limited, its subsidiaries, joint ventures and affiliates (collectively known as company) anywhere in the world and at all levels and grades. This also includes 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.

The policy also encompasses all individuals and organisations 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.

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.

Dissemination of this policy for new joinees is carried out at the time of induction. This policy is also shared with all existing associates. The Company's zero-tolerance approach to bribery and corruption is communicated to all agents, suppliers, contractors, and business partners at the outset of the Company's business relationship with them and as appropriate thereafter.

Tech Mahindra communicates and shares the anti-corruption policies and procedures with all our business partners. We ensure that our business partners sign the contract with Tech Mahindra only after they read, understand, and agree to abide by our Code of Conduct and Anti-Bribery and Corruption policies. These are important annexures to all our business contracts.

Detailed policies for high-risk areas of corruption (D4)

The Tech Mahindra Anti-Corruption and Bribery Policy gives details on our stand on corruption. It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate, and to implementing and enforcing effective systems to counter bribery. 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.

The Company undertakes periodic bribery and corruption risk assessments 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. The policy also highlights a list of possible red flags that may arise during business. If any stakeholder encounters any red flags, they have to report them promptly by following the procedure set out in the Whistle Blower policy (https://insights.techmahindra.com/investors/WhistleBlower_Policy.pdf)

We also have a policy on Ethical Business Conduct
https://insights.techmahindra.com/investors/Code-Of-Ethical-Business-Conduct.pdf
which clearly lists out the details of how we conduct ourselves with integrity. This
includes our stand on
- Legal, honest, and ethical conduct,
- Conflict of Interest
- Other Employment / Assignments
- Disclosure of Interest by Director
- Other Directorships
- Bribery / Kickbacks / Gift and Hospitality
- Non-alliance with Political parties
- Suspected fraudulent behaviour
- Outside employment or any other type of Association
- Public Communication
- Compliance to Schedule IV of the Indian Companies Act
- Maintaining Confidentiality of Information
- Insider Trading

<u>Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption (D2)</u>

Tech Mahindra follows the Business Responsibility and Sustainability Reporting Policy
(BRSR) that provides guidance to businesses on what constitutes responsible business
conduct (https://files.techmahindra.com/static/img/pdf/Tech-Mahindra-BR-Policy.pdf).
The BRSR policy follow the principles based on the National Guidelines on Responsible
Business Conduct (NGRBC) which captures key national and international developments
in the sustainable development agenda and business responsibility field. Some of the key
drivers of the NGRBC are
1. The UN Guiding Principles for Business and Human Rights (UNGPs)
2. UN Sustainable Development Goals (SDGs)
3. Paris Agreement on Climate Change (2015)
4. Core Conventions 138 and 182 on Child Labour by the International Labour
Organization (ILO)
5. Annual Business Responsibility Reports (ABRRs)
6. Indian Companies' Act 2013
Principle 1 of the BRSR addresses the ethical aspect of conducting business
Our Business Practices are governed by the guiding principles of NGRBC which
comprises nine thematic pillars of business responsibility that are known Principles.
These principles are interdependent, interrelated, and non-divisible and all business are
urged to address them holistically.

Principle 1: Businesses should conduct and govern themselves with integrity and in a
manner that is ethical, transparent, and accountable.

1. This Principle recognizes that ethical behaviour in all operations, functions, and processes, is the cornerstone of businesses guiding their governance of economic, social, and environmental responsibilities.
2. The Principle emphasizes that disclosures on business decisions and actions that impact stakeholders form the fundamental basis of operationalizing responsible business conduct and should be accessible to all relevant stakeholders.
3. It recognizes that businesses are an integral part of society and that they will hold themselves accountable for the effective adoption, implementation and the making of disclosures on their performance with respect to the Core Elements of these Guidelines.
4. The Principle further emphasizes that the governance structure of the business should ensure this in line with SDG 16 (Peace, Justice and Strong Institutions Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels)

<u>Commitment to follow all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes (B2)</u>

Tech Mahindra takes our legal responsibilities very seriously. We uphold all laws relevant to countering bribery and corruption. The purpose of the Anti-Corruption and Bribery Policy is to:
a) set out our responsibilities to comply with laws against bribery and corruption; and
b) provide guidance on how to recognize and deal with bribery and corruption issues.
The Company undertakes 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.

Tech Mahindra also periodically reviews and updates the policy
https://insights.techmahindra.com/investors/Anti-Corruption-and-Bribery-Policy.pdf
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.

<u>Publicly stated formal policy of zero-tolerance of corruption (D1)</u>

The Tech Mahindra Anti-Corruption and Bribery Policy
https://insights.techmahindra.com/investors/Anti-Corruption-and-Bribery-Policy.pdf is

publicly available on our website https://www.techmahindra.com/en-in/investors/corporate-governance/ . We declare our zero-tolerance approach to bribery and corruption publicly and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate, and to implementing and enforcing effective systems to counter bribery. All our stakeholders and contacts are prohibited from engaging in any bribery or potential bribery.

Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfil this criterion, including goals, timelines, metrics, and responsible staff

Tech Mahindra already has strong policies on ethical business conduct including corruption which is publicly available.
https://insights.techmahindra.com/investors/Anti-Corruption-and-Bribery-Policy.pdf
https://insights.techmahindra.com/investors/WhistleBlower_Policy.pdf
https://insights.techmahindra.com/investors/Code-Of-Ethical-Business-Conduct.pdf
https://files.techmahindra.com/static/img/pdf/Tech-Mahindra-BR-Policy.pdf

Our associates are informed about their rights and responsibilities regularly through trainings, mailers, and internal platforms. We have created specific interventions to tackle these issues. 100% of our associates must complete these trainings within 3 months of their Onboarding.

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

Internal accounting and auditing procedures related to anticorruption (D10)

As stated in our public Anti-Corruption and Bribery Policy
https://insights.techmahindra.com/investors/Anti-Corruption-and-Bribery-Policy.pdf , we have periodic review and audits of the policy and its implementation. 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.
We have adequate checks and balances in place to ensure that there are no direct or indirect incidents. of bribery or corruption. Our Anti-Corruption and Bribery Policy complies with the legal requirements of applicable laws and regulations, including antibribery, anti-corruption and ethical handling of conflicts of interest.
We ensure implementation through organizational Leadership who are committed to promoting and implementing the Anti-corruption programme across the organisation,

including but not limited to Open House, All Hands Meet and Fireside Chat Session virtually enforcing our commitment to zero tolerance.

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

Complaints can be raised as per the Whistle-Blower Policy https://insights.techmahindra.com/investors/WhistleBlower_Policy.pdf . There is a structured process to deal with corruption incidents. The Corporate Ombudsman ascertains the credibility of the charge. If initial enquiry indicates further investigation is required, a Redressal Committee is appointed to investigate into the complaints within 48 working hours of receipt of the whistle-blower complaint. The Whistle-Blower Policy has a provision to ensure that no one suffers any detrimental treatment because of refusal to take part in corruption, or because of reporting concerns under this policy in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. There is a Reward and Recognition programme to encourage and implement Anti-Corruption and Bribery policy across the organisation.

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

The Board of Directors has overall responsibility for ensuring that Anti-Corruption and Bribery 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. Corporate Ombudsman provides quarterly reports to the Board of Directors, the CEO and Head – HR. Corrective measures, including policy and process changes as recommended by the Leadership Team, are implemented by Compliance Team.

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

Third parties can put the Company at risk if they do not follow ethical business practices. For that reason, the Company develops 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.
The Company's zero-tolerance approach to bribery and corruption is communicated to all agents, suppliers, contractors, and business partners at the outset of the Company's business relationship with them and as appropriate thereafter. Tech Mahindra communicates and shares the anti-corruption policies and procedures with all our business partners. We ensure that our business partners sign the contract with Tech Mahindra only after they read, understand, and agree to abide by our Code of Conduct and Anti-Bribery and Corruption policies. These are important annexures to all our business contracts.

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

We are cognizant of the risk that Bribery and Corruption can pose to the organization's integrity and culture. Our Anti-Corruption and Bribery Policy helps us maintain the required checks and balances to ensure an ethical workforce. Bribery and Corruption can be a risk to our brand, reputation, and business growth. TechM is committed to fight corruption in all its forms – both direct and indirect. We have adequate checks and balances in place to ensure that there is no corruption across our business activities and operations. Compliance with the applicable laws in the geographies we operate in, is a business imperative. The Management ensures knowledge and awareness of current as well as emerging regulations that may apply to Tech Mahindra and ensures compliance through a robust management system

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

The Anti-Corruption and Bribery Policy
https://insights.techmahindra.com/investors/Anti-Corruption-and-Bribery-Policy.pdf
applies to all the associates of Tech Mahindra and the subsidiary companies. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this policy. If necessary and appropriate, they are given adequate and regular trainings on it. The Code of Ethics for Business Conduct covers topics of corruption and bribery. 100% of the employees, including the members of the governing bodies, received the training FY 2020-21

Tech Mahindra practices a zero-tolerance approach to bribery and corruption and is committed to act professionally and fairly in all its business dealings and relationships and in implementing and enforcing effective systems to counter bribery and corruption in any form.

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

annual-report-20-21.pdf (techmahindra.com)

The organization has robust policies and mechanisms to deal with conflict of interest through the Code of Conduct. Risk assessment for bribery and corruptions is done periodically across all our operations and the criteria used for risk assessment include units/departments, location, and the Corruption Perception Index (CPI) index of countries, among others. Tech Mahindra hires an external agency to carry out a review of Internal Financial Controls (IFC) every 6 months. Similarly, statutory auditors review this IFC report of external agency and carry out their own tests. One of the significant risks identified through the risk assessment is stakeholders not following the mandatory TechM code of conduct policies or following incorrect processes, which could lead to improper recruitment practices and vendor empanelment, unethical transfers and promotions, allowances based on bribes (monetary or otherwise) between internal and external stakeholders.

The risk assessment is 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. The policy also highlights a list of possible red flags that may arise during business. If any stakeholder encounters any red flags, they have to report them promptly by following the procedure set out in the Whistle Blower policy (https://insights.techmahindra.com/investors/WhistleBlower_Policy.pdf)

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

The Board of Directors has overall responsibility for ensuring that Anti-Corruption and Bribery 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. Corporate Ombudsman provides quarterly reports to the Board of Directors, the CEO and Head – HR. Corrective measures, including policy and process changes as recommended by the Leadership Team, are implemented by Compliance Team. Organizational Leadership is committed to promoting and implementing the Anti-corruption programme across the organisation, including but not limited to Open House, All Hands Meet and Fireside Chat Session virtually enforcing our commitment to zero tolerance.

Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfil this criterion, including goals, timelines, metrics, and responsible staff

Tech Mahindra already has strong policies on ethical business conduct including corruption which is publicly available.
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https://insights.techmahindra.com/investors/WhistleBlower_Policy.pdf
https://insights.techmahindra.com/investors/Code-Of-Ethical-Business-Conduct.pdf
https://files.techmahindra.com/static/img/pdf/Tech-Mahindra-BR-Policy.pdf
Our associates are informed about their rights and responsibilities regularly through trainings, mailers, and internal platforms. We have created specific interventions to tackle these issues. 100% of our associates must complete these trainings within 3 months of their Onboarding.

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

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. Tech Mahindra practices a zero-tolerance approach to bribery and corruption and is committed to act professionally and fairly in all its business dealings and relationships and in implementing and enforcing effective systems to counter bribery and corruption in any form. The detailed monitoring and evaluation mechanisms for integration of anti-corruption ensures that the cases are reported right away. The internal investigations by the ombudsman team make sure that there is a quick resolution of the cases without it having to go

public. Tech Mahindra does not have any publicly substantiated cases of corruption & bribery in the past five fiscal years and there are no ongoing investigations by local or international authorities

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

Tech Mahindra hires an external agency to carry out a review of Internal Financial Controls (IFC) every 6 months. Similarly, statutory auditors review this IFC report of external agency and carry out their own tests. One of the significant risks identified through the risk assessment is stakeholders not following the mandatory TechM code of conduct policies or following incorrect processes, which could lead to improper recruitment practices and vendor empanelment, unethical transfers and promotions, allowances based on bribes (monetary or otherwise) between internal and external stakeholders.

Public legal cases regarding corruption (D14)

Tech Mahindra did not have any substantiated cases of corruption & bribery in the past five fiscal years and there are no ongoing investigations by local or international authorities
annual-report-20-21.pdf (techmahindra.com)

Process to deal with incidents (D13)

Concerns about Integrity and non-compliance with Tech Mahindra Code of Ethical Business Conduct will be investigated as per process laid down and defined by the CORPORATE OMBUDSMAN, concerns on violation of Code of Conduct for Prohibition of Insider Trading in Securities of Tech Mahindra (including instances of leak of unpublished price sensitive information in terms of the PIT Regulations) will be reviewed and investigated by the Disciplinary Committee. The Associate/s concerned who is/are found to be non-compliant after the investigation, are liable to face appropriate disciplinary action including termination from the services of the company. Tech Mahindra's investigation process includes. • Stakeholders need to write to CORPORATE OMBUDSMAN immediately and raise a concern with required evidences and documents. A minimum 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 blower complaint. The Disciplinary Committee for prevention of Insider trading would consist of following persons (a) Chief Financial Officer, (b) Chief Peoples Officer and (c) Company Secretary • The Redressal Committee/ Disciplinary Committee shall conduct an inquiry and come up with a report within 15 to 45 working days from the date of the initial complaint. • The Redressal Committee/ Disciplinary Committee should recommend the corrective actions to the appropriate managers for implementation. In the event the accused is found guilty, penalties will be prescribed through CORPORATE OMBUDSMAN, and will be

implemented by HR. • The person raising the concern will also receive an update on the outcome.

Leadership review of monitoring and improvement results (D12)

The Board of Directors has overall responsibility for ensuring that 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. Corporate Ombudsman provides quarterly reports to the Board of Directors, the CEO and Head – HR. Corrective measures, including policy and process changes as recommended by the Leadership Team, are implemented by Compliance Team.

Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfil this criterion, including goals, timelines, metrics, and responsible staff

Tech Mahindra already has strong policies on ethical business conduct including corruption which is publicly available.
https://insights.techmahindra.com/investors/Anti-Corruption-and-Bribery-Policy.pdf
https://insights.techmahindra.com/investors/WhistleBlower_Policy.pdf
https://insights.techmahindra.com/investors/Code-Of-Ethical-Business-Conduct.pdf
https://files.techmahindra.com/static/img/pdf/Tech-Mahindra-BR-Policy.pdf
Our associates are informed about their rights and responsibilities regularly through trainings, mailers, and internal platforms. We have created specific interventions to tackle these issues. 100% of our associates must complete these trainings within 3 months of their onboarding.

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 2:
- Atmanirbhar Krishi: Available in 12 languages, this Mobile app helps farmers with relevant weather, land details, surface & groundwater information and crop & soil health details sourced from the respective government departments in a very easy-to-use format. This information is also stored locally in the app so that even in case of low network, the information will always be available to the farmer.
-
- 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. In FY20, as the COVID-19 pandemic spread across the globe, a majority of countries announced the temporary closure of schools, impacting more than 91% of students worldwide. By April 2020, close to 1.6 Bn children and youth were out of school. Tech Mahindra took different initiatives to support online learning during COVID-19.

- SDG 5: One of the key focus areas of Tech Mahindra Foundation's CSR vision is the Empowerment of girls/women. The Board has a mission/mandate that 50% of the beneficiaries of the CSR Initiatives on Employability, Education and Disability should be women. This is part of the CSR vision and a commitment to the idea of gender equality and empowerment of women and girls. Tech Mahindra and NITI Aayog collaborate to support women entrepreneurs. To support women across the country, TechM has collaborated with NITI Aayog's Women Entrepreneurship Platform (WEP). WEP is a first of its kind, unified access portal - that will enable TechM to nurture an ecosystem for women entrepreneurs that can foster entrepreneurial conditions as well as facilitate technological support for innovative ideas and better positioning. Tech Mahindra has partnered with the winners of Women Transforming India (WTI) awards, an initiative of NITI

Aayog, to recognise women leaders in entrepreneurship across various sectors like healthcare, life sciences, agri-tech and education etc.

- 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. In FY21, 15,268 young people were trained in SMART centres and Academies. We were able to provide placements to 7,485 of these people from several socially disadvantaged communities.

- 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. Our employees are advocating the use of ecofriendly products to protect the environment and ensure a sustainable future. Our organisation wide initiatives like '3-4-3 for Individual Social Responsibility', 'Ride for Pride' etc., and the current 'work from home' are ensuring the employees of a carbon neutral future.

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 21.2% saving 18900+ tons of CO2e annually. Replacing old technology and incandescent lamps with LED's and by procuring energy efficient equipment we have saved 7.7 million units of electricity consumption saving 6451 tons of CO2e of emissions
- We have encouraged the use of Microsoft Teams, Tele-Presence, video conferencing, and virtual meetings through online platforms to minimize physical travel reducing Scope 3.
- Procured efficient VRV systems / air conditioners, cooling systems, water coolers and efficient building controls across locations
- Saved 5% of our Energy consumption by adopting Green Building practices
- Conducted energy simulation and used automatic sensors integrated with lighting and aircon units Conserved energy through Datacenter consolidation, server virtualization, and use of modular energy-efficient equipment for Data Centre designs. Natural and adiabatic cooling methods used to save energy
- We conducted rationalization of UPS infrastructure and have integrated Building Management Systems to improve the energy efficiency
- 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.
- Recycled more than 203 Mn liters of water through STP at our various facilities at Noida, Chandigarh, Pune, Hyderabad, Bengaluru, Chennai, Vizag and Nagpur.
- We have installed 4,500+ water restrictors to reduce flow of water conserving 25% of water consumption for more details please refer on pdf page 167-176 at https://insights.techmahindra.com/investors/annual-report-20-21.pdf

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 is a Strategic Partner with WEF (World Economic Forum) and participates in various leadership conversations.
4) Our MD & CEO Mr. CP Gurnani is part of Global AI Council as well as ICT Governor's Council and spearheads various initiatives on AI, Connectivity, 4th Industrial Revolution and others
5) The leadership team has a regular presence at WEF Davos while also engaging at other WEF events across the globe.

The purpose of engagement and public policy participation is to share and disseminate knowledge and best practices and co-create technology enabled solutions for society. We have developed smart grid technologies in the Indian power sector and built 'on-ground' model projects to lead sustainability initiatives at the state level.

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 on promoting climate action with topic "Reimaging 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 Refer page pdf 22 on TechM CEO & MD's coverage in the Davos India Magazine at: https://ciidavos.com/pdf/2021-India%20&%20The%20World%20eMagazine.pdf. TechM engagement at WEF are: 1) To reinvent, businesses need to realign ESG priorities to improve financial returns https://www.weforum.org/agenda/2021/01/davos-agenda-4-areas-we-can-decode-to-achieve-a-sustainable-decade/ 2) Can sustainability & business profitability co-exist? (https://www.weforum.org/agenda/2020/01/sustainability-profitability-co-exist/) 3) Global economic slowdown (https://tech.economictimes.indiatimes.com/catalysts/economic-slowdown-is-just-a-challenge-laced-with-promises/3998) 4) TechM at WEF https://www.weforum.org/organizations/tech-mahindra-limited Also, please see pdf page 143 & 276 of our IAR 2021 at: https://insights.techmahindra.com/investors/annual-report-20-21.pdf

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.

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 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 pdf page 61-62 at https://insights.techmahindra.com/investors/annual-report-20-21.pdf
CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact

Tech Mahindra has taken medium-term and long-term emission targets approved by SBTi (Science Based Targets initiative). Tech Mahindra is signatory to Business Ambition for 1.5°C and 1.5°C Supply Chain Leaders We have taken a target to increase our Renewable Energy usage to 50% by 2025. 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 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 Carbon Neutrality by 2030 and Net Zero before 2040. 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

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

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.

<u>Criterion 21: The COP describes stakeholder engagement</u>

<u>Publicly recognize responsibility for the company's impacts on internal and external stakeholders</u>

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 pdf page 69 at https://insights.techmahindra.com/investors/annual-report-20-21.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 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 pdf page 72-74 at https://insights.techmahindra.com/investors/annual-report-20-21.pdf. For the terms of reference to the Stakeholders Relationship Committee, please refer on pdf page 284 at annual-report-20-21.pdf (techmahindra.com)

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 pdf page 69 at https://insights.techmahindra.com/investors/annual-report-20-21.pdf

*Note: Please refer our Integrated Annual Report 2021 which is according to IIRC framework, TCFD, SASB and CDSB framework and according to GRI standards which is externally assured by KPMG at annual-report-20-21.pdf (techmahindra.com) Please find the assurance statement on pdf page 56 of the report.

References:

- https://insights.techmahindra.com/investors/annual-report-20-21.pdf
- https://files.techmahindra.com/static/img/pdf/esgdata.pdf
- https://files.techmahindra.com/static/img/pdf/statement-of-ghg-assurance-fy-2020-21.pdf
  https://www.techmahindra.com/en-in/sustainability/
- https://files.techmahindra.com/static/img/pdf/SSCM-Supplier-Code-Of-Conduct.pdf
- https://files.techmahindra.com/static/img/pdf/scm-capacity-building-workshop.pdf
- https://files.techmahindra.com/static/img/pdf/Sustainable-Supply-Chain-Management-Policy.pdf

- https://files.techmahindra.com/static/img/pdf/Humanrights-Policy.pdf
- https://files.techmahindra.com/static/img/pdf/techmahindra-climate-policy.pdf
- https://files.techmahindra.com/static/img/pdf/Tech-Mahindra-Environment-Policy.pdf
- https://files.techmahindra.com/static/img/pdf/Tech-Mahindra-Sustainability-Policy.pdf
- https://files.techmahindra.com/static/img/pdf/techmahindra-water-policy.pdf
- Tech Mahindra recognized with prestigious 'A' score for global climate change and water stewardship
- Tech Mahindra Emerges as the Global IT Leader in the Dow Jones Sustainability World Index 2021
- Tech Mahindra Receives HRH The Prince of Wales' Terra Carta Seal in Recognition of the Company's Commitment to Creating a Sustainable Future
- Tech Mahindra joins the 1.5°C Supply Chain Leaders
- Tech Mahindra chairman highlights three areas where firm's prospects lie - The Economic Times (indiatimes.com)
- Anti-Corruption-and-Bribery-Policy.pdf (techmahindra.com)
- Whistleblower Policy (techmahindra.com)