

MODERN SLAVERY ACT – STATEMENT (FY 2016-17)

Tech Mahindra Limited (hereinafter referred to as “We” or “Tech Mahindra”) is publishing this Statement pursuant to Section 54 of the Modern Slavery Act, 2015 to disclose publicly the steps taken to tackle slavery, servitude, forced or compulsory labour and human trafficking.

We are committed to exhibit zero tolerance towards all facets of modern slavery, as elaborated under the Modern Slavery Act, 2015.

In pursuance of this, we publish this statement pursuant to Section 54(1) of the Modern Slavery Act 2015 (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.

Our Structure, Business and Supply Chains

Tech Mahindra is in the business of providing information technology services and solutions, enabling Enterprises, Associates and the Society to Rise™. Our Consulting, Enterprise and Communications solutions, platforms and reusable assets connect across a number of technologies to deliver tangible business value to all our stakeholders.

Tech Mahindra Limited (“Tech Mahindra”) is an Indian public limited company, listed on various Stock Exchanges in India, and has its branches and subsidiaries across 90 countries. Tech Mahindra does its business in UK through its branch office at 401 Grafton Gate East, Milton Keynes MK9 1AT, UK. The branch is managed and represented by country head Vikram Nair. Approximately 1478 employees of Tech Mahindra work in UK at its own offices or at its client locations.

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 b2c 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 Employment Practices Policy ("Policy"). Our anti-slavery policy has been captured in the Employment Practices 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 prioritising our activity accordingly.

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

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

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

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

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

3) Awareness and collaboration

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

4) Building a strong supply chain

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

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

5) Corporate governance framework

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

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

An associate can raise a concern with the Corporate Ombudsman by:

- a. Sending an e-mail to CorporateOmbudsman@techmahindra.com.
- b. In person - Complaints can also be reported verbally on telephone no. 0120-453- 4450. 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 organisations and the private sector.

Together, we can make an even bigger difference in upholding human rights.