

## **LTIMindtree Limited – UK Tax Strategy**

LTIMindtree Limited (“LTIM”) regards this document as complying with its obligation under para 22(2) of Schedule 19 of the UK Finance Act 2016 to publish the group tax strategy for the financial year ended 31 March 2024. This document has been approved by the Chief Financial Officer, by virtue of powers delegated and conferred upon him vide resolution passed by the Board of Directors of the Company on May 2, 2019. This strategy is valid until it is superseded.

### **Introduction**

Headquartered in the Republic of India, LTIM is a global technology consulting and digital solutions company helping more than 400 clients succeed in a converging world. Founded in 1997 as a subsidiary of Larsen & Toubro Limited, LTIM has currently its operations in 36 countries across globe. The Company’s unique heritage gives it unrivaled real-world expertise to solve the most complex challenges of enterprises across all industries. Each day, LTIM team of more than 85,000 LTIM employees’ enable its’ clients to improve the effectiveness of their business and technology operations, and deliver value to their customers, employees and shareholders. As on the date, LTIM in United Kingdom (UK) operates through a wholly owned subsidiary (LTIMindtree UK Limited), a branch (LTIMindtree limited) and a step-down Subsidiary (Syncordis Limited). Any future incorporation or acquisition of a UK based entity either by LTIM or by its subsidiaries shall also be covered under then prevailing tax strategy document.

### **Risk Management and Governance**

With the growing business complexities, competitive pressures, stakeholder’s expectations, compliance management has evolved into a strategic element of business operations impacting everything from corporate governance to comprehensive risk management. The Tax function identifies, manages and ensures that tax risk is minimized. The team provides advice to the business on tax-related issues, undertakes tax filings, engages with tax authorities and assists with various tax forms. LTIM also seeks appropriate professional advice from reputable firms to ensure that it remains compliant with the ongoing tax obligations.

Risk Operating Committee (ROC) - In addition to the terms of reference provided under “LTIM’s Risk Management Policy”, ROC with a view to have an integrated Risk Management approach, is also responsible for:

- Guiding on corrective action plan for mitigation of material non-conformities and exception issues
- Escalation of material non-conformities to the Risk Management Committee of the Board of Directors of LTIM along with action taken report

### **Tax Planning**

LTIM recognizes that it has a responsibility to pay appropriate tax including tax incentives. LTIM, on needs basis, seeks advice from Independent external tax experts, legal and accounting firms to ensure that our risk management decisions are supported with most accurate and relevant interpretations of local country tax laws and regulations. LTIM does not participate in aggressive tax planning for the purposes of tax avoidance. LTIM has an employee Code of Conduct and Supplier Code of Conduct which *inter-alia* includes responsibility of each employee and supplier of the Company to be fair in their tax planning strategy and refrain from tax evasion. LTIM Employees’ & Suppliers’ Code of Conduct are available on the Company’s website; [www.ltimindtree.com](http://www.ltimindtree.com)

which embeds in it the law-abiding culture originating from Group's unique heritage that recognizes and adopts intellectual integrity, and trustworthiness in all business dealings, as a core business value.

### **Tax Compliance**

LTIM seeks to comply with tax filing, tax reporting and tax payment obligations and monitor the same through a Compliance portal which have inbuilt early warning mechanism.

The Company also has a Global Compliance Framework which is suggestive of Compliance Culture within LTIM

### **Approach to dealings with HMRC**

LTIM engages with HMRC with openness, honesty, integrity, respect and fairness and in a spirit of cooperative and proactive compliance. LTIM seeks to achieve this by entering into honest, timely and transparent correspondence with HMRC on tax matters and by co-operating with HMRC at all times.