

LTIMindtree Norge AS (formerly known as Larsen & Toubro Infotech Norge AS) Due Diligence Assessment Report

FY 2022-23

LTIMindtree Norge AS (Formerly LARSEN & TOUBRO INFOTECH NORGE AS)

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Organisasjonsnummer: 921 974 248

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Table of Contents

1	Introduction.....	3
2.	General information.....	3
2A.	About our structure and operations:.....	3
2B.	Supply chain overview.....	3
2C.	Internal guidelines and policies.....	3
2D.	Potential negative consequences for basic human rights and decent working conditions	4
3.	Risk and due diligence assessment.....	4
4.	Measures.....	5
4A.	Preventing and mitigating risks.....	5
4B.	Results.....	6
5.	Declaration.....	6

1 Introduction

This first annual Due Diligence assessment report is published in accordance with Norwegian Transparency Act (“Act”).

The report is made on behalf of LTIMindtree Norge AS (formerly known as Larsen & Toubro Infotech Norge AS) (“Company”). The due diligence assessment for the financial year 2022-23 was carried out for our Company having business registration number 921 974 248, located at Baerum municipality, Fornebu, Norway. The said assessment was carried out duly considering the Organization for Economic Cooperation and Development’s (OECD) guidelines and required parameters. This due diligence assessment report for the financial year 2022-23 is published in parent company’s website (www.ltimindtree.com).

2 General Information

A. About Our Structure and Operations:

LTIMindtree Norge AS of Norway is a subsidiary of LTIMindtree Limited and Company’s business consists of delivering Information Technology (IT) solutions and IT services to clients globally and in Norway. LTIMindtree Limited, the parent entity is a global technology consulting and digital solutions company that enables enterprises across industries to reimagine business models, accelerate innovation, and maximize growth by harnessing digital technologies. One of the main industry sectors in which our Company operates is Banking and Financial Services. Client relationships are at the core of our business. LTIMindtree brings extensive domain and technology expertise to help drive superior competitive differentiation, customer experiences, and business outcomes in a converging world.

B. Supply Chain Overview

Our suppliers are spread across the globe where we procure services from multiple categories of suppliers. Most of our global suppliers are engaged in supplying hardware, software, cloud services, networking equipment, talent management, office space lease and employee travel related services.

C. Internal guidelines and policies and commitments

- a. **Human Rights Policy:** It covers the importance of human rights and strongly advocates upholding the fundamental principles of human rights. The current procurement related process is very transparent and includes best practices in relation to the awarding of contracts.

Our employees have access to several forums where they can highlight matters or concerns, if any, faced at the workplace. Our Company encourages employees having complaints, concerns of suspected incidents, amongst others, unethical practices, violation of applicable laws and regulations to promptly come forward and express them without any fear of retaliation through whistleblower policy. If an employee is aware of someone violating human rights policy or any other policies or law, they are asked to report it immediately to whistleblower email address.

- b. **Whistleblower Policy:** The policy aims to provide a platform that encourages whistleblowers having complaints of actual or suspected incidents of unethical practices or violation of policies, applicable laws and regulations.

- c. **Code of Conduct (COC):** The COC sets forth our values, responsibilities and commitments. It acts as a guiding principle which each employee is expected to imbibe as an integral part of doing business while dealing for Company or representing the Company.

- d. Policy for Prevention of Sexual Harassment:** The policy aims to ensure a safe, secure, and congenial work environment, without any gender bias, inhibition or fear and to spread awareness about the causes and consequences of sexual harassment at workplace.
- e. Equal Opportunity Policy:** It aims at providing an inclusive workplace by providing fair and equal opportunities to employees and applicants with no discrimination based on religion, race, ethnicity, nationality, gender, language, age, sexual orientation, marital status, socio-economic status, political belief, physical and mental ability, thinking styles, education and experience, etc.
- f. Diversity Equity and Inclusion Employee Policy:** The policy aims to create awareness and help build a culture where people feel included and develop a sense of belonging to the Company thereby creating a safe environment and improved engagement for all our employees.
- g. Supplier Code of Conduct:** It sets the minimum threshold for suppliers to conduct themselves with honesty, fairness, transparency, and integrity while being associated with the Company.
- h. Non-discrimination policy:** It aims to provide a safe working environment and prohibits any form of discrimination against applicants or employees.
- i. Anti-Slavery and Human Trafficking Policy:** This policy highlights the aspects around the anti-slavery and human trafficking processes for the organization and its supply chain.
- j. Anti-Bribery and Anti-Corruption Policy:** It reflects our commitment to ensure no bribery and other forms of corruption and conduct business with honesty, integrity and by complying with all applicable laws and regulations.

We also have a working hours policy, leave policy and health and safety policy for all the employees which is aligned as per the regulatory law of the land. We conduct employee surveys regularly to measure employees' feedback on job satisfaction and engagement.

D. Potential negative consequences for basic human rights and decent working conditions

We have carried out due diligence risk assessment to identify and assess the actual human rights violations in the operations, supply chain and business operations.

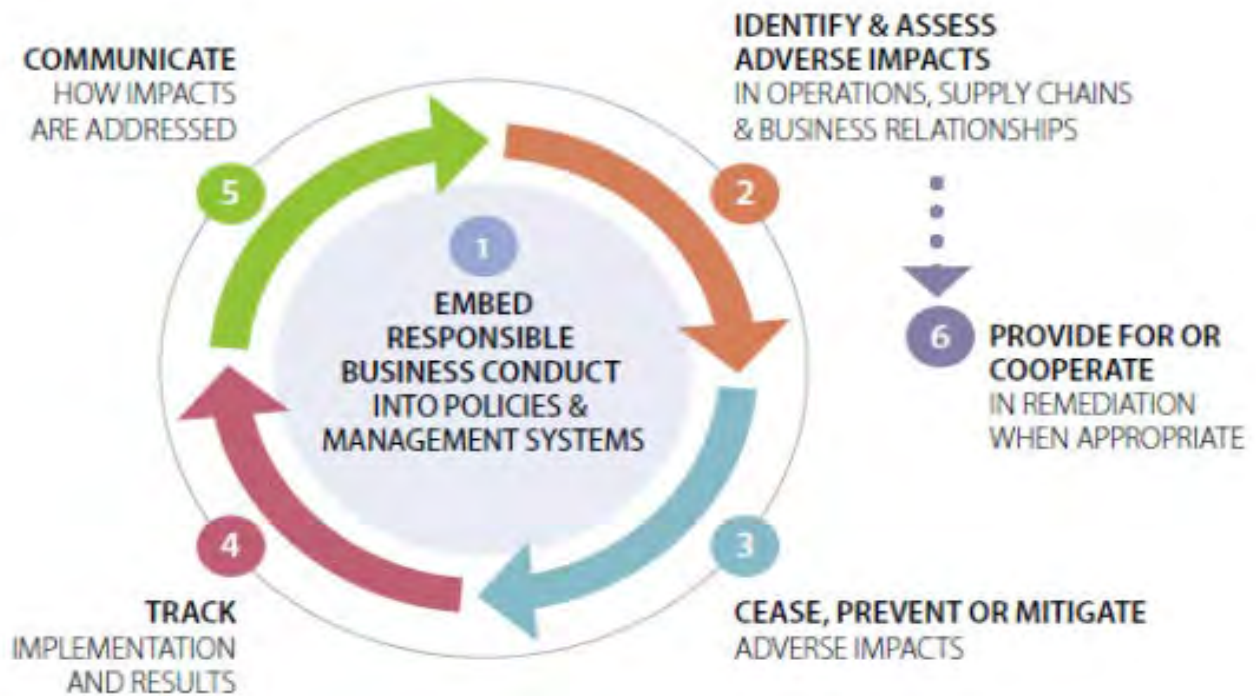
We have identified the below areas to assess the potential risk of negative consequences impacts:

- Fair working conditions
- Fair working hours
- Health and safety including risk assessment of health and safety at workplace
- Non-discrimination and anti-harassment
- Freedom of association
- Rights of minorities or indigenous people
- Sanitation and cleanliness at workplace
- No instances of child labour, forced labour and human trafficking at workplace or hiring process.

We have carried out due diligence assessment of the above negative consequences and identified that there are no potential negative impacts due to human rights violations.

3. Risk and due diligence assessment

We have identified and assessed actual and potential adverse impacts associated with the Company's operations, products, or services, supply chains through our due diligence process which is described below:



Suppliers at our Company have been broadly segregated into five major segments that includes information technology, admin & facilities, talent acquisition, corporate activities and Nxt- Geospatial. Risk rating have also been maintained for all suppliers.

Given the above analysis and the current/ proposed controls, there is a low probability of any adverse impact in the supply chain being caused due to potential human rights violation. Hence, the current level of risk on the issues highlighted as per the Norwegian Transparency Act is assessed as low.

4. Measures

A. Preventing and mitigating risks

- We have carried out annual due diligence risk assessment for FY 2022-23.
- We have agreements with vendors which have all the clauses including but not limited to human rights, minimum wages, child labour, forced, bonded or indentured labour or involuntary prison labour.
- Our purchase orders terms cover clauses related to human rights.
- We have a detailed onboarding process for our new suppliers who are required to mandatorily accept our supplier's code of conduct.

- e. We ensure that our suppliers abide by our supplier code of conduct which is comprehensive.
- f. We ensure minimum wages are paid by suppliers as per regulatory requirements.

- g. We have on our website whistleblower policy and contact channels for complaints by any stakeholder (including an anonymous reporting option).
- h. Our business operations and processes are covered by quarterly internal audit which aims to carry out review and arrive at process gaps and remediation plans.
- i. We have mandatory e-Learning module content which is comprehensive and covers areas related but not limited to human rights, equal opportunity, workplace harassment, code of conduct, prevention of sexual harassment and related content.

B. Results

We have carried out a due diligence risk assessment for FY 2022-23 and as per the risk assessment outcome, we do not have any significant risk related to violation of human rights anywhere in the global and domestic operations and supply chain of our Company. As part of risk assessment, it was noted that none of the identified suppliers are from manual labour-intensive sectors which can have potential risk of human rights violation. Given the assessment and the current controls, the current level of risk on the issues highlighted as per the Norwegian Transparency Act is assessed as low.

5. Declaration

This statement has been prepared by our Company pursuant to the Norwegian Transparency Act for the financial year 2022-2023. The statement has been approved by the sole director of LTIMindtree Norge AS on June 27, 2023.

For LTIMindtree Norge AS,



Sarbajit Deb
Director

Date: 27-June-2023