

# LTIMindtree Norge AS Due Diligence Assessment Report

## FY 2024-25

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

Office Address: Strandveien 50, 1366 Lysaker, Norway  
Organisasjonsnummer: 921 974 248

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Parent Company: LTIMindtree Limited (Formerly Larsen & Toubro Infotech Limited)  
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LTIMindtree Limited is a subsidiary of Larsen & Toubro Limited

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## 1 Introduction

This third annual Due Diligence assessment report is published in accordance with the Norwegian Transparency Act ("NTA").

The report is made on behalf of LTIMindtree Norge AS ("Company"). The due diligence assessment for the Financial Year (FY) 2024-25 was carried out for our Company having business registration number 921 974 248, located at Strandveien 50 1366 Lysaker, Oslo, Norway. The said assessment was carried out duly considering the Organization for Economic Cooperation and Development's (OECD) guidelines for Multinational Enterprises and required parameters. This due diligence assessment report for FY 2024-25 is published on the parent company's website.

## 2 Our Structure and Operations

LTIMindtree Norge AS is a Norwegian subsidiary of LTIMindtree Limited and delivers Information Technology (IT) solutions and IT services to clients in Norway and globally.

LTIMindtree Limited 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.

Our Company operates in the Information Technology sector that employs trained technical staff to efficiently cater to the customers' deliverables. Suppliers at our Company have been broadly segregated into the following five major segments: (i) information technology, (ii) admin and facilities, (iii) talent acquisition, (iv) corporate activities, and (v) Nxt- Geospatial.

## 3 Supply Chain Overview

Our suppliers are spread across the globe where we procure services from multiple categories of suppliers. Our global suppliers are engaged in a diverse range of products and services worldwide, including hardware, software, cloud services, networking equipment, talent acquisition, office space leases, corporate activities, admin, facility, security, infrastructure, health, and employee travel services. Our approach to supplier management is that of progressive partnership, with a focus on core business requirements of quality, sustainability, and ethical practices. We have implemented a Global Procurement Process to ensure that our suppliers meet our standards for sustainability and ethical practices.

## 4 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 policy reflects adherence to the applicable laws of the respective jurisdictions and are guided by the international standards of human rights.

Our employees have access to forums where they can highlight matters or concerns, if any, faced at the workplace. Our Company encourages employees to have 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 the whistleblower email address.

- b. **Whistleblower Policy:** The Policy aims to provide an appropriate platform and protection to whistleblowers to make protected disclosure via email, hotline, intranet portal or by post, of any actual or suspected incidents of unethical practices, violation of applicable laws and regulations. The Policy also provides for adequate safeguards against retaliation and victimization of the whistleblower.
- c. **Employee 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 representing the Company.
- d. **Policy for Prevention of Sexual Harassment:** The policy aims to ensure a safe, secure, and congenial work environment, without fear of discrimination, prejudice, gender bias or any form of harassment and to spread awareness about the causes and consequences of sexual harassment at the 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, gender identity, gender expression, gender status, language, age, sexual orientation, marital status, socio-economic status, 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.
- k. **Mandatory training Policy:** This Policy is applicable to all the employees of the Company globally and will help to form a guideline for employees. This training program allows our employees to improve their attitude, the workplace behavior, it helps Company to comply with laws, reduce liability risks, and operate effectively.

We also have a working hours policy, leave policy and environment, 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.

## 5 Potential negative consequences for basic human rights and decent working conditions

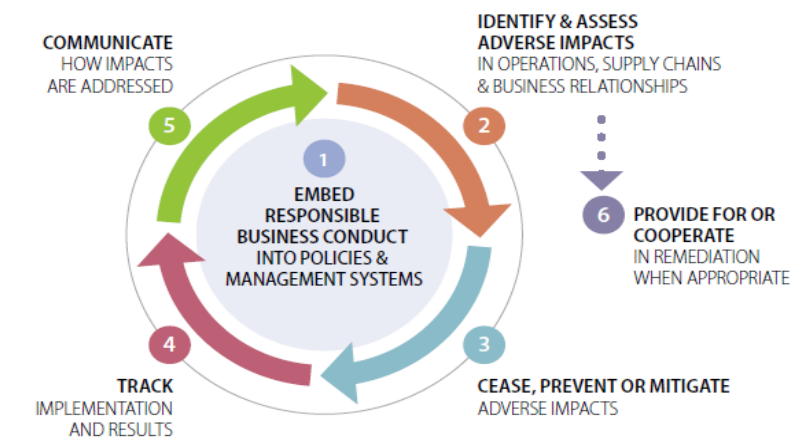
We have carried out due diligence risk assessment to identify actual and potential adverse impacts associated with the enterprise's operations, products, or services and access the human rights violations.

We have identified the following areas to assess the potential risk of negative impacts on human rights and decent working conditions:

- Fair working conditions and working hours
- Environment, Health, and Safety ("HSE") at workplace
- Risk assessment on Health and Safety of employees at workplace
- Non-discrimination and anti-harassment
- Anti Bribery & Corruption
- Freedom of association
- Rights of minorities or Indigenous people
- Sanitation and cleanliness at workplace
- Child labor, forced labor, and human trafficking at workplace or hiring process.
- Migrant worker exploitation
- Labour rights violation
- Minimum wages

## 6 Risk and due diligence assessment

We have conducted a due diligence assessment of actual and potential adverse impacts on human rights and decent working conditions associated with the Company's operations, products or services and supply chain in accordance with the NTA and OECDs guidelines, as described below



During this due diligence process, we did not identify any actual or material risk of adverse impacts on human rights and/or decent working conditions in our supply chain.

## 7 Preventing and mitigating risks

- a. We have carried out the annual due diligence risk assessment for FY 2024-25.
- b. We have agreements with vendors which have all the clauses including but not limited to human rights, minimum wages, child labor, forced, bonded, or indentured labor or involuntary prison labor.

- c. Our supplier code of conduct contains cover clauses related to compliance with laws human rights and fair labor practices, anti-slavery, anti-child labor and anti-human trafficking and duly emphasizing on HSE protection.
- d. We have a detailed onboarding process for our new suppliers who are required to mandatorily accept our Supplier's Code of Conduct.
- e. We have supplier due diligence and mandatory e-learning training in the Code of Conduct which covers all employees, contractors, sub-contractors and suppliers/vendors. The mandatory eLearning covers topics related but not limited to: human rights values, freedom of association and collective bargaining wherever applicable, modern slavery, child labor, forced or compulsory labor, domestic servitude slavery, debt bondage, deceptive recruitment for labor or services, sexual exploitation, human trafficking equal opportunity, workplace harassment, cyber bullying, prevention of sexual harassment, whistleblower, and related content.
- f. We carry out Supplier Due Diligence and Background verifications.
- g. We have automated due diligence tools that cover regulatory, compliance and adverse media due diligence.
- h. We have a transparent procurement process which includes the best industry practices.
- i. Our business operations and processes are periodically audited.
- j. We are in the process of including human rights due diligence within broader enterprise risk management systems to go beyond identifying and managing material risk.
- k. We have in place a Whistleblower Policy and an internal reporting channel to facilitate the reporting of any violations.

## 8 Results


We have carried out a due diligence risk assessment for FY 2024-25 and as per the risk assessment outcome, we did not identify any violation or significant risks of violations related to violation of human rights anywhere in our operations or supply chain. Given this assessment and our existing and proposed controls, there is a low probability of any adverse impact on the supply chain due to potential human rights violation. Hence, the current level of risk on adverse impacts on human rights and decent working conditions, as highlighted per the Norwegian transparency act, is assessed as **Low**.



## 9 Declaration

This statement has been prepared by our Company pursuant to the Norwegian Transparency Act for the FY 2024-2025. The statement has been approved by the Board of LTIMindtree Norge AS on June 24, 2025.

For LTIMindtree Norge AS,

  
SARBAJIT DEB

Sarbajit Deb  
Director

Date: 24-06-2025