

LTIMindtree CSR Policy

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1 LTIMindtree CSR Policy

Record of Review

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1.0	Pratyush Panda	B.S. Saluja	Corporate Social Responsibility Committee	Dec 20, 2022
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Philosophy

- LTIMindtree, hereon referred to as the Company, fosters a culture of caring, trust, and continuous learning while meeting the expectations of all stakeholders and society at large. As a responsible corporate citizen, the Company contributes towards inclusive growth by empowering communities and accelerating development.
- The Company's Corporate Social Responsibility (CSR) policy framework details the mechanisms for undertaking various programs in accordance with section 135 of the Companies Act 2013 for the benefit of the community.

Themes

The Company will primarily focus on computer literacy and education as part of its CSR program, which will include, amongst others, the following verticals:

- Skills Development & Employability: This may include, but will not be limited to, programs covering computer literacy and training programs for the employability of disadvantaged youth.
- Education: This may include, but will not be limited to, support to educational institutions, educational programs, and nurturing talent at various levels for disadvantaged youth.
- Educational Aids: This may include, but will not be limited to, supporting differently abled and other students by providing IT infrastructure support for specific programs.
- Environment & Climate Change: May include programs for the conservation and preservation of the environment.
- Women Empowerment: This may include supporting eligible NGOs with infrastructure and facilitating market reach.
- Health & Nutrition: This may include supporting the cause of Infant Mortality Rate (IMR), Maternal Mortality Rate (MMR), and malnutrition, and facilitating mainstreaming with government-run projects and schemes.

And further, the Company shall support the CSR programs at the L&T Group level, wherever applicable.

 Governance, technology, and digital would be the key drivers across all these verticals.



CSR Budget

- The board of the Company shall allocate at least 2% of the average profit (as required by the Companies Act 2013) during the three preceding financial years.
- The Company may collaborate or pool resources with other entities to undertake CSR activities.
- In case of any surplus arising out of CSR programs shall not form part of the business profits of the Company.

CSR - Roles and Responsibilities

• The CSR governance structure comprises the board, CSR committee, and CSR team.

The Board

The board of directors of the Company will:

- Approve the CSR Policy of the Company.
- Ensure spend of 2% of the Company's profits.
- Disclose the content of the CSR policy in its report, place the policy, Annual Action Plan, and provide details of the committee composition on the Company's website as prescribed under Section 135 of the Companies Act 2013 read with the Companies (Corporate Social Responsibility Policy) Rules 2014 (CSR Rule).
- Ensure that the social programs undertaken are aligned with the CSR Policy of the Company.
- Specify reasons in its report for not spending the earmarked amount in case the Company fails to spend such an amount.
- Approve the Annual Action Plan (including amendments) as recommended by the CSR committee.

CSR Committee

CSR Committee of the Board

• The board has formed the CSR committee in accordance with the requirements of the Companies Act 2013.

Responsibility of the CSR committee

- Formulate and recommend the CSR policy to the board for approval.
- Monitor the policy from time to time.



- Recommend the amount of expenditure to be incurred on CSR programs.
- Constitute a transparent monitoring mechanism for ensuring the implementation of the CSR program by allocating the program to locations to implement the same.
- Recommend the Annual Action Plan (including amendments thereto) to the board for approval.

CSR Team

Responsibilities of the CSR team

- Spread awareness regarding the approved CSR policy.
- Provide guidance to locational CSR team members to ensure that all CSR programs are aligned with the Company's CSR policy.
- Recommend programs to be undertaken during the financial year to the CSR committee of the board.
- Facilitate effective implementation of LTIMindtree's CSR policy across locations.
- Promote synergy amongst locations and share best practices to achieve the desired outcome for community development.
- Develop measurable benchmarks and get the same approved by the CSR committee.

Implementation

- CSR program will be undertaken by the Company in identified areas. It will also undertake need assessments as and when required.
- The time period/duration over which a particular program will be spread will not be more than three financial years (excluding the year of its commencement) as per CSR rules, its nature, extent of coverage, and the intended impact of the program.
- The Company may enter into partnerships with the government, business partners, and communities to create a multiplier effect of its social programs.
- The mode of implementation of CSR programs will include a combination of direct implementation and/or through partners such as NGOs, trusts, academic institutions, business associates, registered societies, etc. The Company will select its partners after appropriate due diligence.
- The Company may use the services of internal teams, employee volunteers, expert agencies, consultancy firms, etc., wherever required for carrying out baseline surveys, guidance on program design and implementation, impact assessment surveys, etc.



Monitoring and Reporting Framework

• The Company has constituted a mechanism to monitor and report the progress of its CSR programs. An accounting system has been established by the Company to ensure program-wise accounting of CSR spend. The corporate will be responsible for monitoring and implementing the CSR program. The CSR team will also ensure the effectiveness of its CSR program through third-party audits and report the CSR performance to the CSR committee.

At the CSR committee level:

- The CSR committee will review the implementation of the CSR program and the CSR audit reports periodically, preferably on a quarterly basis, and arrange to share the best practices in the Company.
- Review the implementation and monitoring mechanism appropriately.
- Report to the board appropriately.

Disclosure

 The CSR policy framework, committee composition, and Annual Action Plan will be displayed on the website of the Company. The board will include an Annual Report on the CSR activities in the format specified under the Companies (Corporate Social Responsibility Policy) Rules, 2014.

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