

LTIMindtree Norge AS Due Diligence Assessment Report

FY 2023-24

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

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

Parent Company: LTIMindtree Limited (Formerly Larsen & Toubro Infotech Limited)
Registered Office: L&T House, Ballard Estate, Mumbai - 400 001. INDIA
www.ltimindtree.com | Email: info@ltimindtree.com | CIN: L72900MH1996PLC104693

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1 Introduction

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

The report is made on behalf of LTIMindtree Norge AS ("Company"). The due diligence assessment for the Financial Year (FY) 2023-24 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 and required parameters. This due diligence assessment report for the FY 2023-24 is published on the parent company's website (www.ltimindtree.com).

2 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.

3 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. 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 current procurement-related process is transparent and includes best practices in relation to contract awarding.

Our employees have access to 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 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. **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 the 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, gender identity, gender expression, veteran 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.

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

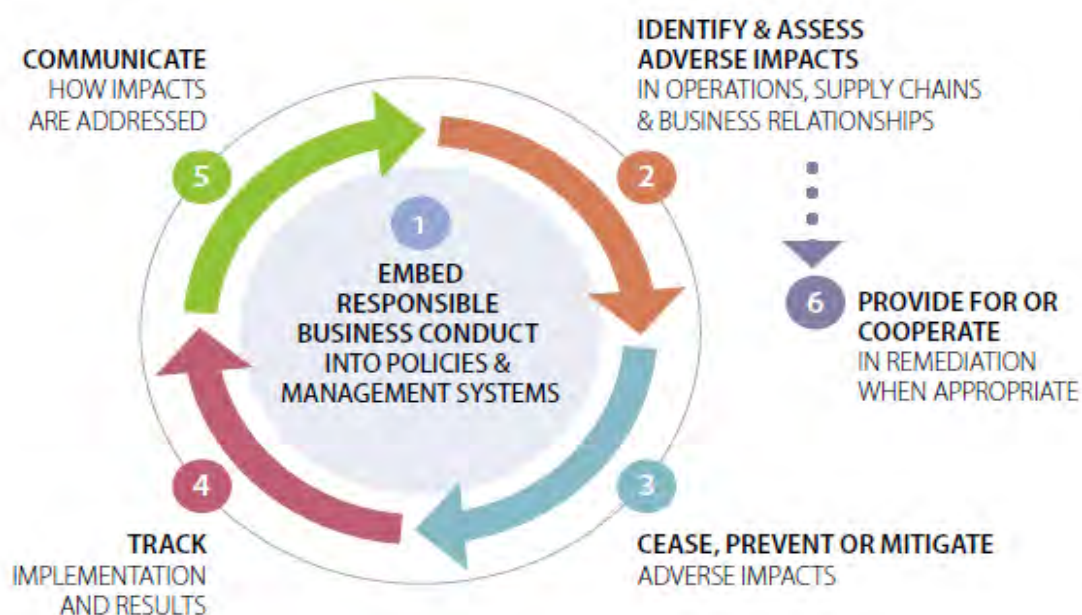
We have carried out due diligence risk assessment to identify actual and potential adverse impacts associated with the enterprise's operations, products, or services and access the human rights violations.

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

- Fair working conditions and working hours
- Environment, Health, and Safety 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 labour, forced labour, and human trafficking at workplace or hiring process.
- Migrant worker exploitation
- Labour rights violation
- Minimum wages

6 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:



Our Company operates in the IT sector that employs trained technical staff to efficiently cater to the customers deliverables. Suppliers at our Company have been broadly segregated into five major segments that includes information technology, admin and facilities, talent acquisition, corporate activities and Nxt-Geospatial. Risk ratings 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**.

7 Preventing and mitigating risks

- a. We have carried out the annual due diligence risk assessment for FY 2023-24.
- b. 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.
- c. Our purchase orders terms cover clauses related to human rights.
- 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 trainings on Code of conduct for all employees which covers areas related but not limited to human rights, equal opportunity, workplace harassment, prevention of sexual harassment, whistleblower, and related content.
- f. We carry out regulatory, compliance and adverse media due diligence.
- g. We have a transparent procurement process which includes industry best practices.
- h. Our business operations and processes are periodically audited.
- i. We are in the process to include the human rights due diligence within broader enterprise risk management systems to go beyond identifying and managing material risk.

8 Results

We have carried out a due diligence risk assessment for FY 2023-24 and as per the risk assessment outcome, we do not have any significant risk related to violation of human rights anywhere in the operations and supply chain of our Company. Given the assessment and the current and proposed controls, there is a low probability of any adverse impact in the supply chain 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**.

9 Declaration

This statement has been prepared by our Company pursuant to the Norwegian Transparency Act for the FY 2023-2024. The statement has been approved by the Board of LTIMindtree Norge AS on June 27, 2024.

For LTIMindtree Norge AS,



Sarbajit Deb
Director

Date: 27-06-2024