

# Whistleblower Policy – Poland Annexure

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## 1 Introduction

In addition to the overarching principles outlined in our Global Whistle Blower policy, there are certain Poland-specific guidelines as mentioned in the Law on the Protection of Whistleblowers that LTIMindtree ('the Company') need to adhere to.

These guidelines have been put in place to ensure the compliance with local regulations and to provide a clear framework for reporting any concerns or unethical behaviour within our organization.

It is highly important to familiarize yourselves with these Poland-specific guidelines to fully understand the procedures and protections available to whistleblowers in Poland. It is essential that we all remain vigilant and proactive in maintaining the highest standards of integrity and transparency within our team and continue the Company's commitment to upholding our values and ethical standards.

## 2 Effective Date

This Policy is effective from December 02, 2024.

## 3 Authority and Approval

Global HR Compliance Team is responsible for maintaining the policy annexure and carrying out subsequent modifications time to time. The same will be reviewed annually or as and when required by Global HR Compliance team along with the respective stakeholders. The Company reserves the right to amend it at any point of time to ensure consistency with applicable laws, if any. Any change or revision will be available with all relevant stakeholders and HR Teams and communicated appropriately to all employees.

## 4. Definition

Whistleblower is an individual who reports or publicly discloses information about a violation of the law obtained in a work-related context which includes director, permanent employee, part time employees, temporary employees, trainees, apprentice, former employee, job applicant, prospective employee, contractors, subcontractors, service provider, Supplier, any employee of a vendor, consultant, facilitator, client, entrepreneur, prokurent (a commercial proxy or attorney who represents a company), legal representatives, shareholder or volunteers who has made a Protected Disclosure.

## 5. Applicability

The Whistleblower Policy is applicable to all as mentioned in Definition (Clause 4). The Policy is applicable to LTIMindtree as well as its subsidiary Companies where they are eligible to make Protected Disclosure under the Whistleblower Policy in relation to matters concerning LTIMindtree and its subsidiary Companies operations in Poland as defined in Scope (Clause 6) below.

## 6. Scope

The Whistleblower has serious concern about reporting violations of law, consisting an unlawful act or mission or aimed at circumventing the law which concerns corruption, public procurement, financial services, money laundering, terrorist financing, product compliance & safety, transportation safety, environmental protection, radiological protection & nuclear safety, food & feed safety, animal health & welfare, public health, consumer protection, privacy & personal data protection, Network security, info & communication system, financial interest of the state treasury of the Republic of Poland, local government unit and the European Union, the internal market of the European Union, including the public law principles of competition, state aid and corporate taxation, constitutional freedoms, rights of man and citizen - occurring in the relations of the individual with public authorities and unrelated to the areas indicated above.

## 7. Reporting System

The Whistleblower Policy outlines the procedure for raising a complaint and for addressing the complaint.

- (1) A Whistleblower intending to make a Protected Disclosure against a Respondent must post the same by either of the ways:
  - a. Email to [Whistleblower@ltimindtree.com](mailto:Whistleblower@ltimindtree.com)
  - b. By courier/post addressed to:
    - (i) for India – Attn: Whistleblowing Investigation Committee, LTIMindtree Limited, Gate no. 5, Technology Tower 1, Saki Vihar Road, Powai, Mumbai – 400072, India and
    - (ii) for other locations, LTIMindtree’s corporate office for such location.
  - c. Logging a complaint in the Whistleblower section on Ultima (Available at: <https://whistleblower.ltimindtree.com/newdisclosure.aspx>)

- d. Logging a complaint on <https://ltimindtree.integritymatters.in> (Third party hosted web page)
- e. Calling on a Third party operated Whistleblower Hotline
  - India toll-free: 1800-102-6969
  - USA toll-free: (+1) 888-436-0393
  - Rest of the world (Paid) number: (+91) 9595-146 -146
- f. Reporting can also be done in a face-to-face meeting. At the request of the whistleblower, an oral report shall be made at a face-to-face meeting arranged within 14 days of receipt of such request. In such a case, with the consent of the whistleblower, the report shall be documented in the form of:
  - a. a recording of the conversation, making it searchable, or
  - b. minutes of the meeting, reproducing its exact course, prepared by the unit or person or LTIMindtree. the whistleblower may verify, correct, and approve the meeting minutes by signing them.
- g. Reporting can also be done via an unrecorded telephone line or other unrecorded voice communication system. An oral report made via an unrecorded telephone line or other unrecorded voice communication system shall be documented in the form of a record of the conversation, reproducing the exact course of the conversation.

The submission of the Protected Disclosure shall be acknowledged, unless submitted anonymously, within seven (7) days of receipt thereof, and the WBIC will promptly act on the Protected Disclosure.

- (2) Where required under applicable law, the Whistleblower shall be informed of the broad outcome of the inquiry within the period specified under such law, but in no circumstance will the WBIC be bound to share with the Whistleblower the full report of the enquiry relating to a Protected Disclosure. Also, the WBIC is not bound to accept the recommendations made by the Whistleblower, if any, of action against the Respondent.

The maximum time limit for providing feedback to the whistleblower, not exceeding 3 months from the date of confirmation of acceptance of the internal report or, if confirmation is not provided, 3 months from the expiration of 7 days from the date of the internal report, unless the whistleblower has not provided a contact address to which feedback should be provided.

## 8. Register of Internal Report

The register of internal reports shall be maintained electronically adhering to appropriate safeguards of General Data Protection Regulation (GDPR) and Act of 10 May 2018 on the Protection of Personal Data and shall contain details below:

The application number, the subject of the violation of the law, the personal data of the whistleblower and the person affected by the report, necessary to identify them, the whistleblower's contact address, the date on which the application was made, information on follow-up actions taken, date of termination of the case.

Personal data and other information in the register of internal reports shall be kept for a period of 3 years after the end of the calendar year in which the follow-up actions were completed, or after the completion of the proceedings initiated by these actions.

The requirement of disposal of above data does not apply if the documents related to the report form part of the files of preparatory proceedings or court or administrative court cases.

## 9. Procedure for Internal Reporting

The procedure for internal reporting shall be established after consultation with the company trade union, or company trade union organizations if there is more than one company trade union organization in the LTIMindtree or representatives of persons performing work for the LTIMindtree, selected according to the procedure adopted in the LTIMindtree, if there is no company trade union organization in the LTIMindtree.

As per the Act on protection of Whistleblowers Poland, the representative of persons performing work for the employer must be elected as per the procedure adopted in the company.

The internal notification procedure shall take effect 7 days after it is made known to a person performing work in the manner adopted by the LTIMindtree.

A person applying for a job on the basis of an employment or other legal relationship providing the basis for the provision of work or services, or the performance of a function, or the performance of a service, the LTIMindtree shall

provide information about the internal notification procedure with the commencement of recruitment or pre-contract negotiations.

At the same time, the Law on the Protection of Whistleblowers, Poland, regulates the basic content of the procedure, stating that the internal notification procedure specifies:

1. the internal organizational unit or person within the organizational structure of the LTIMindtree, or an external entity, authorized by the LTIMindtree to receive internal reports.
2. how a whistleblower may submit internal reports, together with e-mail address, hereinafter referred to as the “contact address.”
3. an impartial internal organizational unit or person within the organizational structure of the LTIMindtree, authorized to take follow-up actions, including verification of the internal report and further communication with the whistleblower, including requesting additional information and providing feedback to the whistleblower; this function may be performed by the internal organizational unit or person referred to in item 1, if they ensure impartiality.
4. the procedure for handling information on violations of the law reported anonymously.
5. the obligation to confirm to the whistleblower the receipt of an internal report within 7 days of its receipt, unless the whistleblower has not provided a contact address to which the confirmation should be forwarded.
6. the obligation to follow up, with due diligence, by the internal organizational unit or person referred to in point 3.
7. a maximum time limit for providing feedback to the whistleblower, not exceeding 3 months from the date of acknowledgement of the internal report or, if the acknowledgement referred to in item 5 is not provided, 3 months from the expiration of 7 days from the date of the internal report, unless the whistleblower has not provided a contact address to which feedback should be provided.
8. comprehensible and easily accessible information on making external notifications to the Ombudsman or public bodies and, if applicable, to institutions, bodies or organizational units of the European Union”



## 10. Rights of Whistleblower

Whistleblower has right to claim compensation in the amount not less than twelve times the average monthly salary in case of retaliation and right to obtain feedback on follow up action enabling assessment of whether report received an appropriate response.

Whistleblower rights:

- A person who has suffered damage due to a whistleblower knowingly reporting or disclosing untrue information to the public is entitled to compensation and damages for the violation of personal rights from the whistleblower who made the report or public disclosure.
- A whistleblower who has been the victim of retaliation has the right to compensation of an amount not lower than the 12 times the average monthly wage in the national economy in the previous year, or the right to damages.



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