

**Sustainable Supply Chain Management
Supplier Code of Conduct**

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1. INTRODUCTION

This Sustainable Supply Chain Management (SSCM) Code of Conduct applies to all the suppliers, vendors, contractors and companies who provide Tech Mahindra with products and services (suppliers, vendors, contractors and companies who provides us with products and services shall henceforth be referred as “Suppliers”). It states our expectations from suppliers with respect to their compliances and business commitments towards environmental, social and governance best practices.

We expect them to abide by and ensure continuous improvements in

1. Ethical business practices
2. Management practices that respect the rights of all employees and the local community
3. Privacy and Data protection
4. Prohibited business practices as per law of the land
5. Minimising impact on the environment
6. Providing a safe and healthy work place

TechM recognises that our suppliers are independent entities; however, the business practices and actions of a supplier may impact on or reflect upon TechM. Sustainability is deemed to make significant contribution to company's success and suppliers plays a major role in this. Better quality products and services are produced by suppliers with superior operating principles and practices.

We bind all our suppliers to the following social, ethical and environmental minimum standards of conduct and encourage each supplier to adopt practices with preferred and favoured standards. We actively engage with our key suppliers for making our Supply Chain sustainable.

2. COMPLYING WITH LEGAL REQUIREMENTS

Our suppliers shall comply with the local and national laws, our guidelines and appropriate authorizations obligations, and any other regulations, covered under the [Sustainable Supply Chain Management Policy](#) of TechM.

2.1 LABOUR / WORKPLACE MANAGEMENT

TechM engages with suppliers who share our commitment to human rights and fair employment practices in accordance with existing international standards such as the:

1. UN Universal Declaration of Human Rights,
2. International Covenant on Civil and Political Rights,
3. ILO Declaration on Fundamental Rights at Work, and
4. UN Convention on the Rights of the Child.
5. Modern Slavery Act, 2015 and Modern Slavery Act 2018 (Cth)

At a minimum, the supplier shall:

1. Comply with all relevant and applicable local and national laws regulations, licenses, and restrictions with regard to employment practices, benefits, health and safety and anti-discrimination.
2. Document and maintain written labour/workplace management policies and standards.
3. Provide a workplace free of direct or indirect discrimination, harassment or bullying on the grounds of gender, age, race, nationality or ethnic origin, disability, family responsibilities or parental status, marital status, the occupation of spouse or partner, medical or irrelevant criminal record, political convictions, pregnancy or potential pregnancy, religious beliefs or activities, sexual preference or sexuality, industrial activity or union membership, physical appearance, social origin or carers' responsibilities.
4. Treat their workers equally with regard to salaries, recruitment, professional training, promotion and working conditions, irrespective of criteria such as the ethnic origin, sexual orientation, gender, age, union membership or political and religious views of individuals. The suppliers shall ensure compliance with minimum working hours and minimum wages prescribed by applicable local laws and regulations.
5. Not use child, forced or involuntary labour in any form.
6. Remain committed to the provision of training and development for employees.
7. Provide fair pay and working conditions, including adequate rest periods and parental leave, and match prevailing working conditions.
8. Give consideration to the needs of, risks to and requests made by employees, as a stakeholder in the operation of the business.
9. Recognize and respect the right to freedom of association and collective bargaining of its employees consistent with local/ national laws and regulations.

2.2 OCCUPATIONAL HEALTH AND SAFETY

TechM engages with suppliers who are committed to maintaining and improving the work environment so that it is safe and healthy for all staff, contractors, and visitors, with policies and programs that go beyond legislated requirements.

At a minimum, the supplier shall:

1. Comply with all relevant and applicable local and national laws regulations, licenses, and restrictions with regard to occupational health and safety, maintain a safe and secure working environment and provide for health-related benefits to employees.
2. Identify Health and safety hazards, and monitor their impacts o prevent any accidents and occupational diseases
3. Define and maintain written safety and health policies and standards.
4. Define and maintain documented system to identify and reduce work-related injuries and illness.
5. Develop and implement a training program on health and safety measures for employees

2.3 RISK MANAGEMENT

TechM engages with suppliers who have a robust and documented risk management framework which incorporates social, ethical and environmental risks into their risk management processes.

At a minimum, the supplier shall:

1. Define and maintain a written Business Continuity Plan (BCP), to minimize business impacts in the event of major disruption, which is integrated across business units and regularly tested.
2. Define and maintain Emergency Response Plan (ERP), to minimize harm to employees, the local community and local environment in the event of a site disaster, which is integrated across business units and regularly tested.
3. Maintain a Risk Register which covers all associated risks that impacts operations and their handling techniques.

2.4 ENVIRONMENT

TechM's suppliers are expected to provide products or services to TechM and to conduct their business operations in a way that protects and sustains the environment.

We prefer suppliers who:

1. Take precautionary approach towards environmental stewardship and ensure responsible business practices
2. Set environmental targets,
3. Report publicly on environmental indicators, and
4. Conduct independent audits against appropriate standards or certification schemes.

We engage with suppliers who take responsibility for their products, processes and services throughout their lifecycle, including product stewardship and extended product responsibility.

We prefer suppliers who offer products and services with an improved environmental impact, or who are willing to develop products and services with an improved environmental impact.

At a minimum, the supplier shall:

1. Comply with all relevant and applicable local and national laws, regulations, licenses, and restrictions with regard to land and water management, waste and recycling, the handling and disposal of toxic substances, discharges and emissions, air and water quality, noise, transportation of products, wastes and materials, material selection, environmental issues management and community consultation. This includes environmental permit and reporting requirements.
2. Define and maintain a written environment policy.
3. Define and maintain a written environmental management plan to identify and minimize the impact of their activities on the environment.

4. Identify environmental risks associated with its business activities, products or services & mitigation plans and shall minimize its impact by adopting energy, water and waste reduction programs.

2.5 CORPORATE GOVERNANCE AND ETHICS

TechM engages with suppliers who demonstrate a commitment to take account of their own responsibilities with an overall philosophy, approach and policies complementary to our own. We prefer suppliers who establish management systems (policies, plans, accounting and reporting mechanisms, and performance measures) which provide for compliance assurance and continual improvement, have an Employee Code of Conduct, and that report externally on social, ethical and environmental performance. The Supplier shall maintain effective anti-corruption, anti-fraud and anti-bribery programs and comply with these prohibited business practices

At a minimum, the supplier shall:

1. Comply as applicable, with all local and national laws, regulations, licenses and restrictions on prohibited business practices like bribery, corruption, fraudulent practices, kickbacks of any kind, antitrust and competition laws.
2. Make practical efforts to minimize the use of energy, water and materials. Where possible, these shall be renewable or sustainably sourced.
3. Conduct their business in accordance with high ethical standards.
4. Declare the rule and management process for the activities that could be perceived to constitute a conflict of interest.
5. Define rules in place containing precise description on disciplinary practices
6. Provide a formal complaints management process for employees, suppliers and members of the communities in which they operate or provide services to.
7. Establish effective and transparent allocation of responsibilities between Board and management, where an applicable organisational structure exists.
8. If the Supplier or employees of the Company have evidence, doubts, or suspicions regarding any form of corruption, or other criminal or non-compliant conduct, while engaging with Tech Mahindra, they shall immediately inform and report through the TechM whistleblowing line. TechM will not tolerate any form of retaliation against anyone who, in good faith, communicates facts that could constitute a breach of this Code.
9. Promote timely and balanced disclosure of material matters concerning services provided by the company to TechM. It is the supplier's responsibility to achieve and maintain these minimum standards and train employees on their consequential rights and obligations.

Nothing in this code limits a supplier's obligations under the terms of their contract with TechM. It is the supplier's responsibility to achieve and maintain these minimum standards and train employees on their consequential rights and obligations.

The Tech Mahindra Corporate Ombudsman is responsible for overseeing and managing compliance aspects of the organization (including with respect to this Policy). For any concerns, the supplier can reach out to the Corporate Ombudsman at CORPORATEOMBUDSMAN@techmahindra.com or be reported verbally on telephone no. 0120-488- 4450. Verbal reports will normally be documented by the CORPORATE OMBUDSMAN by a written transcription of the verbal report.

2.6 SUPPLY CHAIN

TechM engages with suppliers who set out social, ethical and environmental objectives and/or targets for their suppliers, and screen and monitor suppliers on this basis.

At a minimum, the supplier shall:

1. Adopt similar principles to these in dealing with their own key suppliers.
2. Adhere to acceptable business practices with their own suppliers, including providing for timely payment and reasonable contractual conditions.

2.7 COMMUNITY ENGAGEMENT

TechM is committed towards responsible Business growth and extends its responsibility to the local communities. TechM's approach is to understand the issues facing the communities in which we operate, and to endeavor to conduct business in a way that builds social capital and achieves a positive impact. We engage with suppliers who share this philosophy, as demonstrated by engagement with community stakeholders and long term, strategic involvement in community partnerships to address key social issues. TechM shall prefer local suppliers wherever possible to promote community engagement.

2.8 FEEDBACK FROM THE VENDOR

The feedback is collected from the Vendor and analysed for continual improvement.