

## **Lobbying Policy**



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## 1. PURPOSE

The vision of Tech Mahindra is to create a purpose-led company and focus on responsible business growth rising to the call for an equitable and responsible future for all.

To focus on this vision and the commitment towards shared value for the greater good of all, it needs to ensure sustainable business growth by reposing the faith of internal and external stakeholders and enhancing the sustainability of the global ecosystem in which it operates as part of the Mahindra Rise philosophy. Lobbying in support of climate change action that can help accelerate the development and implementation of policies to meet the goals of the Paris Agreement forms a crucial part of Tech Mahindra's sustainable business strategy.

Lobbying helps the company to achieve maximal operational efficiency and output, all-round improvement in stakeholder relationships, enhancement in brand value, ultimately leading to future readiness. Tech Mahindra's guidelines for conducting lobbying activities is based on transparency, accountability and integrity while engaging with non-profit organizations, trade and business associations, and industry alliances and coalitions.

## 2. SCOPE

The guideline applies to lobbying activities undertaken by the associates, executive leadership, and board members of Tech Mahindra across its Indian and global operations and subsidiary companies.

## 3. DEFINITION

In the context of this guideline, 'lobbying' describes interactions with policy makers and other external stakeholders with the intent to represent Tech Mahindra's perspective in the policy making process. Active contribution to policy making is an integral part of the democratic process and a legitimate activity as it enables the representation of different societal interests.

## 4. COMMITMENT

Tech Mahindra has set ambitious ESG targets, adopted medium-term and long-term emission targets approved by the Science Based Targets initiative (SBTi), committed to the Business Ambition of 1.5°C; aiming to achieve carbon neutrality by 2030 and Net Zero by 2035, Tech Mahindra is Signatory to "The Climate Pledge" in partnership with Amazon, to reach Net Zero emissions by 2035, and has a target to increase its Renewable energy mix to 50% by FY2026. A structured 5-year ESG Roadmap guides our actions, ensuring accountability and optimal performance driven by our commitment to innovation. We lead the way in pioneering solutions that transcend conventional boundaries, driving progress and sustainability while upholding our core values.

## 5. POLICY

Tech Mahindra is committed to lobbying in accordance with the relevant laws and regulations in line with its strong compliance policies and practices. The purpose of engagement and public policy participation is to share and disseminate knowledge and best practices and co-create technology-enabled solutions for society.

### **Principles and Rules for Responsible Lobbying:**

Lobbying should not be misused for any corrupt or illegal purposes, or to improperly influence any decision. Relevant functions provide guidance on how lobbying should be conducted based on the values of transparency, honesty, and integrity.

#### Principle 1: Core Values

Transparency, honesty, and integrity guide our lobbying activities, ensuring trust and credibility in our interactions.

#### Principle 2: Informed Decision Making

Our lobbying enables informed decisions that improve patient outcomes, support our sustainable business mission, and foster a positive healthcare environment.

#### Principle 3: Ethical Lobbying

We don't improperly influence decisions or induce stakeholders to violate their duties. Tech Mahindra's stakeholders to lobby on behalf of the company should therefore be aware of all applicable regulations and apply the following rules:

1. Avoid quid-pro-quo arrangements and gifts that could influence decisions
2. Clearly disclose Novartis' representation and interests
3. Provide truthful, accurate, and non-misleading information, based on sound understanding of the issues
4. Conduct thorough due diligence when selecting third-party lobbyists, ensuring alignment with our principles
5. Seek clearance from HR and Legal before discussing potential employment of former policymakers, adhering to internal cooling-off periods
6. Avoid conflict of interest and disclose potential conflicts
7. Report lobbying activities and expenditure accurately and transparently

**Oversight:**

The Board oversees the alignment of Tech Mahindra's sustainable strategy with the agenda of the business and trade associations it is a part of. At the management level, the Sustainability Council of Tech Mahindra, which includes the CSO, CFO, CPO, and heads of CS and legal, has an oversight on lobbying and climate-related issues. The Sustainability Council reviews the lobbying activities and the annual budgets, memberships and associations aligned with climate goals and ESG interests of the company.

**Engagement:**

Tech Mahindra engages and collaborates with the Government directly as well as through Industry Associations, International Multilateral Bodies, and local and regional organizations. It participates in and supports the public policy formulation for societal welfare.

**Governance Framework:**

Tech Mahindra has an effective internal governance, oversight process and control framework to ensure that its lobbying activities, and that of their trade associations and industry alliances, does not undermine efforts to deliver the goals of the Paris Agreement by delaying, diluting, or preventing effective climate policy that is aligned with the treaty.

The comprehensive framework maps its initiatives with its environmental sustainability intent, rooted in its material topics. The three main organizational goals of Tech Mahindra are: Being a responsible business by working to mitigate the impact of climate change, demonstrating environmental stewardship by creating benchmarks for the industry, and propagating an eco-lifestyle by involving its people, associates, and partners as well as communities for maximal impact.

Tech Mahindra recognizes the interest of stakeholders in any advocacy it might undertake or that might be undertaken on its behalf. It is careful about being party to any lobbying and recognizes the importance of having strong internal governance. The governance of Tech Mahindra's industry associations is built on three pillars: transparency, accountability, and integrity.

**Transparency:**

Tech Mahindra is committed to being transparent about its memberships and publicly reporting the total yearly contributions made to industry associations.

**Accountability:**

The marketing team and the sustainability council are accountable for the company's memberships and lobbying activities with the various industry associations.

Lobbying activities of Tech Mahindra are transparent, enabling scrutiny and evaluation by other stakeholders, thereby enhancing the accountability to the Paris Agreement.

**Integrity:**

Tech Mahindra's position on climate change is aligned with policies that are in line with the Paris agreement and Tech Mahindra is a member of those climate associations that follow similar standards. Tech Mahindra has principles, rules, standards, and procedures that give its stakeholders clear directions on how they are permitted to engage with lobbyists. They should cast no doubt on their impartiality to promote the public interest, share only authorized information and not misuse 'confidential information', disclose relevant private interests and avoid conflict of interest.

The Board of Directors at Tech Mahindra maintains comprehensive oversight of the risks and opportunities facing its business because of climate change and its impact. The oversight mechanism, which is a part of Tech Mahindra's robust corporate governance, comprises ESG Governance and Enterprise Risk Governance, led by the CSR Committee and the Risk Management Committee of the Board, respectively. The CSR Committee is chaired by MD and CEO who is responsible for ensuring that the overall corporate strategy seamlessly integrates the sustainability agenda while prioritizing organization's climate risks and opportunities.

**Review and Monitoring:**

The governance in place enables Tech Mahindra to identify any activity by an industry association that might not be aligned with Tech Mahindra policies or practices.

**Due Diligence:**

The expected level of due diligence with respect to the standards, policies, and policy positions of the industry association is completed before the membership is approved. The internal teams ensure that the associations are aligned to the policies, principles, and practices on climate change and ESG principles of Tech Mahindra

**Monitoring:**

The Internal teams that manage the relationships with the industry associations ensure constant monitoring, supplemented by an annual independent review to ensure the ideas, goals and vision of the organization are in line with the associations Tech Mahindra is a member of.

Stakeholders who may identify issues of potential concern have been provided with a channel, on the Tech Mahindra website, to raise concerns or questions about its memberships. Any stakeholder who wishes to raise an issue of concern confidentially, can do so through the Tech Mahindra whistle-blower process. [https://insights.techmahindra.com/investors/WhistleBlower\\_Policy.pdf](https://insights.techmahindra.com/investors/WhistleBlower_Policy.pdf)

The Sustainability Council has oversight on Tech Mahindra climate policy and advocacy priorities and positions. The marketing team also ensures that the associations that Tech Mahindra is a member of are in tune with the priorities of its stand on climate change and ESG aspects.

Tech Mahindra provides a review of the policy and advocacy positions of some of the key industry associations annually on its website.

**Actions to address non-alignment:**

Tech Mahindra addresses any non-alignment identified and provides an update annually. The important decisions relating to the review are discussed at the senior executive level and escalated to the Executive Committee if needed.

In case of any misalignment in climate and energy transition-related policy or advocacy positions, Tech Mahindra will take one or several of the following steps depending on its assessment of the importance of the topic, the extent of the misalignment, and the broader value of its membership:

- Increase transparency about its own policy and advocacy positions, and the differences with key industry associations, by publishing this information on the website.
- Remain in the association and increase the engagement with it in areas where Tech Mahindra has different views.
- Pursue Tech Mahindra's advocacy independently or through other associations or coalitions.
- Reassess Tech Mahindra's membership where material misalignment in climate and energy transition-related positions are identified, including ending activities such as board and committee participation, or ending overall membership.

Tech Mahindra supports policies that help to achieve the goal of the Paris Agreement and net-zero emissions by 2050.

Tech Mahindra believes that industry associations provide unique ways to get involved in climate and energy transition policies and advocacy. Tech Mahindra is committed to tackling climate change problems and introduces a basic understanding of vulnerabilities, risks, uncertainties, and adaptations in relation to climate change for business and society. Tech Mahindra is signatory to Business Ambition of 1.5 degree Celsius, and to 'The Climate Pledge' and its emission reduction targets are aligned to India's Nationally

Determined Contributions (NDCs) under the Paris Agreement. It has taken targets to become carbon neutral by 2030 and net zero by 2035 by adopting a low carbon economy pathway and communicate hazards of climate change risks and seek opportunities to develop solutions that will help reduce emissions for its stakeholders also.

## **6. IMPACT**

The trade association memberships of Tech Mahindra allow it to share views and ideas on overall best industry practices, emerging risks, and opportunities, including climate change and aligns it to participate and work efficiently towards achieving industry standards.