

Responsible Artificial Intelligence (AI) Policy

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Purpose

This document sets out a high-level overview of Tech Mahindra's policy for the use of Artificial Intelligence (AI) within Tech Mahindra and in approved customer environments to ensure that risks to the business are appropriately managed and that AI solutions are developed and deployed responsibly. All associates are required to adhere to this policy and ensure the secure, safe, ethical, data privacy-compliant, regulatory-compliant and responsible use of AI Applications, Technology and cybersecurity. It is mandatory that all teams ensure that AI solutions align with Tech Mahindra's Responsible AI Principles and applicable legal, ethical, security, privacy, and regulatory requirements.

Scope

The policy applies AI-based solutions, products and applications used for various purposes related to application development, information gathering, information validation or processing or analysis or generation.

Applicability & Governance

This document is applicable to all Associates, contractors, business units, authorized users, vendors, partners, and other stakeholders who build, deploy, manage, or otherwise utilize AI applications or AI-enabled solutions for Tech Mahindra or customer delivery.

TechM shall establish appropriate governance structures, oversight mechanisms, and accountability frameworks to support compliance with this policy. The Board is the highest decision-making authority responsible for overseeing the implementation of this policy. TechM will periodically review and update this policy to reflect changes in legal, technological, and organizational requirements.

Key Responsible Ai Principles

1. Associates shall build, use, develop, and deploy AI solutions that adhere to ethical, regulatory, safety, security and data privacy standards. This includes ensuring the solution avoids bias, discrimination and manipulative behaviour, ensuring data privacy and protection, and promoting fairness, impartiality and clear accountability within algorithmic decision making as well as the overall service delivered. AI project delivery must document how the AI Centric Services have been designed for complying with these requirements.
2. Associates shall maintain transparency in their AI practices and provide clear explanations of how AI tools work, disclosing limitations and potential biases, risks and impacts, and being open about data sources and algorithms. AI project delivery must ensure the project documentation shall disclose when and how AI is being used to let people know that the AI-driven decision was scrutinized before implementation. This includes clear labelling of AI-generated content and outcomes of AI-driven decisions, and proactively informing users when they are interacting with an AI system rather than a human.
3. Associates shall comply with the cybersecurity and data privacy requirements and measures as these will be the cornerstone of Tech Mahindra's AI-centric services so that employee, customer and enterprise data are suitably protected. Data shall not cross Tech Mahindra or

customer tenant boundaries, or other restricted environments set within TechM Infrastructure or 3rd party SaaS Applications, including being used by 3rd Party Applications or Tools for training their AI Models.

4. AI systems shall operate within clearly defined and approved boundaries, including authorized scope, permitted use cases, capabilities, limitations, guardrails, safeguards, control points, and escalation mechanisms, and shall not engage in manipulative behaviour, exploitation of vulnerabilities, social scoring, unauthorized biometric surveillance, misuse, or unintended application.
5. TechM shall establish a structure for monitoring the use and outcomes from AI, incorporating user feedback where appropriate and emphasizing to associates that AI can produce relevant and accurate work only with human oversight. The applicable level of oversight (Human-in-Command, Human-on-the-Loop, or Human-in-the-Loop) shall be defined and documented for AI systems influencing decisions that impact individuals. Users shall be proactively informed when interacting with an AI system instead of a human.
6. Accountability of AI outcomes, risk decisions, compliance obligations, and legal responsibilities, shall be established through defined roles, responsibilities and governance mechanisms, including support for investigation and remediation of errors or harm resulting from the use of AI systems.
7. TechM shall embrace a culture of continuous learning and improvement in AI development. This includes staying up to date with relevant developments, monitoring and addressing potential biases, security threats and errors, and investing in ongoing training and education for employees working on AI projects.
8. AI-generated output shall be used to fill gaps in the work being done since the risk of infringement claims are based on the use of Output, and the consequences from any infringement (e.g., an injunction to use infringing Output), are more manageable if AI Output forms only part of the work rather than all or most of the work being done.
9. TechM shall consider and seek to minimize the environmental impact and ecological footprint of its AI tools, supporting infrastructure, and technology providers through energy-efficient technologies, responsible use of computing resources, sustainable data centre operations, and promotion of sustainability throughout the AI lifecycle.

About Tech Mahindra

Tech Mahindra (NSE: TECHM, BSE: 532755) offers technology consulting and digital solutions to global enterprises across industries, enabling transformative scale at unparalleled speed. With 146,000+ professionals across 90 countries, Tech Mahindra provides a full spectrum of services including consulting, information technology, enterprise applications, business process services, engineering services, network services, customer experience & design, AI & analytics, and cloud & infrastructure services. It is the first Indian company in the world to have been awarded the Sustainable Markets Initiative's Terra Carta Seal, which recognizes global companies that are actively leading the charge to create a climate and nature-positive future. Tech Mahindra is part of the Mahindra Group, founded in 1945, one of the largest and most admired multinational federation of companies.



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