



ANTI-HUMAN TRAFFICKING AND MODERN DAY SLAVERY STATEMENT

FOR FISCAL YEAR 2024/25

INTRODUCTION

Modern-day slavery is a crime and a violation of fundamental human rights. It takes various forms, such as forced labour, sex trafficking, involuntary servitude and human trafficking, all of which force persons to work against their will in order to exploit them for personal or commercial gain.

Tata Communications (UK) Limited is a wholly owned subsidiary of Tata Communications Limited, a company incorporated in India and having its equity shares listed on BSE Limited and the National Stock Exchange of India Limited. This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes Tata Communications (UK) Limited’s slavery and human trafficking statement for the Fiscal Year 2024-25. The Act requires the Company to state the steps taken during FY-25 to ensure that modern slavery and human trafficking do not take place in their business operations and supply chains. Tata Communications (UK) Limited and its affiliates (hereinafter referred to as “Tata Communications” or “Company”) are committed to continually reviewing and improving their efforts to combat slavery and human trafficking. This Anti-human trafficking and Modern-day slavery statement for FY-25 has been reviewed and approved by the Board of Directors of Tata Communications (UK) Limited through a Board Resolution dated 12th September 2025.

TATA COMMUNICATIONS’ BUSINESS AND OPERATIONS

Tata Communications is a digital ecosystem enabler that powers today’s fast-growing digital economy. The Company enables the digital transformation of enterprises globally, including 300 of the Fortune 500 - unlocking opportunities for businesses by enabling borderless growth, boosting product innovation and customer experience, improving productivity and efficiency, building agility and managing risk. With its solutions orientated approach and proven managed service capabilities and cutting-edge infrastructure, Tata Communications drives the next level of intelligence powered by cloud, mobility, Internet of Things (IoT), collaboration, security, and network services. Tata Communications powers over 30% of the world’s internet routes, connecting businesses to 80% of the world’s cloud giants and 4 out of 5 mobile subscribers. The Company’s capabilities are underpinned by its global network, the world’s largest wholly owned subsea fibre backbone and a Tier-1 IP network with connectivity to 190+ countries and territories around the world.

OUR COMMITMENT TO COMBATTING MODERN-DAY SLAVERY & HUMAN TRAFFICKING

Tata Communications is dedicated to ensuring that the fundamental rights of people involved in our operations throughout the value chain are respected. The Company has a zero-tolerance approach to modern day slavery. We are committed to ensuring that modern slavery and human trafficking do not occur in our workplace or within our supply chain. Respect for human rights, ethically and environmentally sound business practices as well as fair and safe working conditions and employees’ well-being are fundamental parts of our culture and identity. The Company has instituted various policies and programs to establish the framework of our commitment to human rights and ethical behaviour in our work environment. Our policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

TATA GROUP VALUES

Tata Communications’ Core Values (Integrity, Responsibility, Unity, Pioneering and Excellence) are the foundation of our Company’s ethical framework. Tata Communications recognizes the importance of treating our colleagues, vendors, contractors, stakeholders and other third parties with integrity and respect. This commitment includes ensuring that our actions and the actions of our suppliers do not involve human trafficking or modern-day slavery. In addition, our Company takes seriously, our responsibility to ensure a safe, humane, and fair workplace for our entire workforce. We hold our vendors and partners to these same standards and commitments.



TATA CODE OF CONDUCT

The core framework that outlines our Company's values and ethical principles is the **Tata Code of Conduct** (the "Code"). The Code addresses how we expect everyone in our work environment to be treated, and how we expect everyone in our workplace to treat others:

Every individual in our work environment must be treated with dignity and respect. We do not tolerate any form of harassment, whether sexual, physical, verbal or psychological.

The Code also describes our commitment to combatting human trafficking and rejecting forced and child labour:

We do not use forced labour in any form. We do not confiscate personal documents of our employees or force them to make any payment to us or to anyone else in order to secure employment with us, or to work with us.

The Code also confirms our broader commitment to the human rights of all our stakeholders, including freedom from slavery, servitude and forced labour:

We shall respect the human rights and dignity of all our stakeholders.

All our contractors, suppliers, and other business partners are expected to be compliant with and follow our Code or similar standards.

Tata Communications provides its employees with annual trainings on the Code, and employees certify their commitment to the Code on an annual basis. The Company provides supplementary in-person and virtual trainings to employees on specific ethics and compliance subjects throughout the year. This includes topics on how employees should treat everyone in the workplace.



SUPPLY CHAIN MANAGEMENT

Our relationships with suppliers are rooted in our strong ethical core values. We take pride in upholding our core values. These values drive Tata Communications' business decisions and define the way we conduct business with our suppliers. By remaining true to our values, ethics and corporate social responsibility principles, we have earned the trust of thousands globally. We value the relationships that we have established and built with our suppliers. We believe in maintaining long-term relationships in order to deliver growth and success for both us and our suppliers. To ensure that every relationship is effective and beneficial to all parties, we ask that our suppliers uphold the same core values and mission.

In addition to our own employees, Tata Communications also expects all its contractors, suppliers and other business partners to adhere to the standards outlined in the Code:

We seek to work with suppliers and service providers who can demonstrate that they share similar values. We expect them to adopt ethical standards comparable to our own.

In line with the principles and requirements outlined in the Code, the Company published a [Supplier Code of Conduct](#) ("SCoC") in FY 2021-22. The SCoC outlines Tata Communications' expectations for Suppliers' conduct with respect to ethics, labour and human rights, health and safety, environmental protection, and management practices.

COMPANY POLICIES & GOVERNANCE FRAMEWORK

At Tata Communications, we believe in forging mutually beneficial ties with our rightsholders including employees, suppliers, communities, investors and regulators to uphold the highest standards of accountability, transparency, fairness and ethical conduct. In our commitment to safeguard human rights across our operations, the Corporate Social Responsibility, Safety and Sustainability Committee established by the Board of Directors of Tata Communications Limited as a standing sub-committee assists the Board in its oversight of key human rights matters. Further, the Business and Human Rights Assessment (BHR) conducted by the Company on a periodic basis also aims to identify, evaluate and mitigate any human rights issues within the value chain.

- **Business and Human Rights Policy:** The Company has adopted a [Business and Human Rights Policy](#) relevant and applicable to all our rightsholders (employees, contract workforce, communities, consumers/customers, value chain partners, etc.) as identified by the Company. The Policy encompasses various business human rights salient elements like Anti-bribery and Anti-corruption, Acceptable Use of Network and Services, Equal Opportunity, Fair Competition, Community, Dignity & Respect, Fair Wages, Freedom of Association and Collective Bargaining, Right to Privacy, Integrity of Information and Assets, Freedom of Expression, Health & Safety, Product & Services, Anti-Human Trafficking & Modern Slavery, Child Labour, Data Privacy & Security, etc.

"Trafficking, Modern Slavery and Child Labour: The Company has a zero-tolerance approach to modern day slavery. As defined under the Company's Supplier Code of Conduct and Sustainable Supply Chain Policy, we are committed to ensuring that modern slavery and human trafficking do not occur in our workplace or within our supply chain. We do not employ children at our workplaces, and we do not use forced labour in any form." – **Business and Human Rights Policy**

- **Global Dignity in the Workplace Policy:** Tata Communications' Global Dignity in the Workplace Policy further elaborates on the Company's commitment to eliminating all forms of discrimination, harassment, bullying and retaliation in the workplace. This includes any actions that could amount to human rights abuses including human trafficking, forced labour, and/or any other behaviours deemed to be modern-day slavery under applicable laws.

The Company's other human resource policies also ensure that our employees and contractors are hired and treated fairly and humanely during their employment or contract with Tata Communications. This includes ensuring that, when applicable, the Company recruits, houses, compensates, and repatriates' employees, contractors, and temporary workers of legal working age in accordance with applicable laws. When recruiting and offering employment to its workforce, the Company does not use fraudulent or misleading or coercive practices, nor does it use recruiters who do not comply with labour laws or charge recruiting fees to the workforce in countries where recruitment fees are against the law. Where required, the Company also ensures that employment agreements and other relevant employment documents are in the individual's local language and advises them of their rights and remedies under applicable law. To the extent that we partner with other agencies to expand our workforce, Tata Communications ensures that we only engage with reputable agencies who demonstrate the same commitment to ethics and compliance with laws as we do. Their commitment to these standards is outlined in the vendor agreements that are signed prior to their engagement.

- **Sustainable Supply Chain Framework**

Our ability to identify, assess, and mitigate supply chain risks is critical in developing long-term supply chains. Risks in the supply chain can disrupt our operations, impacting our overall organisational performance. Before engaging suppliers, thorough due diligence is conducted to ensure that the supplier shares the same values and principles as Tata Communications. The relevant contracts also include terms on the Company's values and assurances that they are not being violated. Further, the Company has rolled out a comprehensive Sustainability Supply Chain Framework for our operational teams by integrating the all-encompassing sustainability parameters of our supply chain and formulating a framework that comprises three tools of implementation:

- **Sustainable Supply Chain Policy:** The policy is a vision document that aims to promote sustainability for our suppliers and business partners. The Company recommends that all its suppliers follow at least the minimum environmental, social and ethical standards and encourage each supplier to adopt practices with standards preferred under Tata Communications' Supplier Code of Conduct.
- **Supplier Code of Conduct:** The Supplier Code of Conduct outlines Tata Communications expectations for supplier conduct in relation to five primary principles: Ethics and Transparency, Labour and Human Rights, Environment, Health and Safety, Anti-corruption and Anti-bribery, and Information Security. Our Supplier Code of Conduct and Sustainable Supply Chain Policy are available on the Company's website.
- **ESG checklist for suppliers:** The checklist is used to evaluate the Environmental, Social & Governance (ESG) related practices of Tata Communications' suppliers/business partners on an annual basis. Based on the ESG checklist, we also determine the sustainability score of our suppliers to comprehensively evaluate sustainability practices within our Company's key and strategic supplier network.

At Tata Communications, we expect our suppliers to uphold the sustainability vision endorsed in the Company's Sustainable Supply Chain Policy and follow our core principles given in the Supplier Code of Conduct by consenting to adhere to our policy and SCoC before commencing business with us.

Child Labour and Forced Labour: Our Human Resource policies also ensure that our employees and contractors are hired and treated fairly and humanely while working or contracting with Tata Communications. When recruiting and providing employment, our Company does not use deception, fraud, or coercion. It also does not employ recruiters, who do not comply with labour laws or charge recruitment fees in countries where not permitted. Our operations and suppliers across geographies are not likely to pose a significant risk of child labour or forced labour incidents. In addition, we have not received any complaints or claims regarding a child or forced labour in our operations, and supply chain from internal and external stakeholders.

HIGHLIGHTS OF FY2024-25

Oversight of Business Human Rights at Tata Communications is anchored at the highest level through the Board-level CSR, Health, Safety and Sustainability Committee ('Committee'). This apex Committee reinforces the Company's commitment to upholding human rights by overseeing associated mechanisms, performance, and strategic alignment with related business processes. The findings of the Business and Human Rights ('BHR') assessment conducted in FY-24 were presented to the Committee in FY-25 along with the action plan including an update on the development and upcoming rollout of a new BHR e-learning module, aimed at strengthening awareness and capacity building across the organization.

Tata Communications strengthened its BHR framework in FY-25 through several targeted initiatives, ensuring alignment with global best practices and deeper integration of human rights principles across its operations. Key highlights include:

1. E-Learning Module on Business and Human Rights

A comprehensive e-learning module on Business and Human Rights has been designed to build awareness and to reinforce a culture of respect, dignity, and accountability across all employee levels. The module is scheduled for roll-out in Q2 FY-26 and has been structured into five segments:

- Fundamentals of Human Rights
- Relevance of Human Rights in the context of business
- The Company's role and responsibility in upholding these rights
- Legal and ethical obligations beyond compliance
- Real-life scenarios and reporting mechanisms

2. Enhanced Transparency in BHR Reporting

With an aim to embed accountability and make our human rights performance measurable and transparent, the Company has significantly enhanced the accessibility of its human rights disclosures. Performance and progress related to BHR is now consistently reported through the Company's Integrated Annual Report, a dedicated ESG Addendum and disclosures made under various sustainability rating frameworks (including CDP, Ecovadis, and DJSI).

3. UN Global Compact – Communication on Progress (COP)

The Company has commenced annual submission of the UN Global Compact's Communication on Progress (COP) from FY25. Through this report, the Company reaffirms its alignment with the UNGC's Ten Principles in the areas of human rights (non-complicity in human rights abuses), labor, environment, and anti-corruption, while providing transparent updates on performance and future commitments.

4. ESG Assessments for Strategic Suppliers

In partnership with EcoVadis, the Company conducted ESG assessments for its strategic and preferred suppliers, with specific focus on Labor & Human Rights, Environmental Practices, Ethics, and Sustainable Procurement. As of FY-25, 31.6 % of the key suppliers have been assessed and enabled with targeted improvement plans where necessary. These assessments are central to driving accountability and advancing ethical sourcing practices.

6. Supplier Diversity Program

The Company has progress on its journey towards inclusive sourcing by further strengthening the Supplier Diversity Program. In FY-25, the Company onboarded four (4) additional suppliers from affirmative and marginalized communities. To foster engagement, the Company has also developed a Supplier Diversity Questionnaire and conducted awareness sessions to build capabilities within these communities.

7. Training and Capacity Building

Company employees have undertaken the mandatory e-learning modules (Tata Code of Conduct and Dignity at Workplace) which include salient elements pertaining to Business Human Rights, including training on Anti-Human Trafficking and Modern-Day Slavery.

For more details on the Company's management, approach and performance on the subject, please refer to our [Integrated Annual Report for FY-2025](#).

REPORTING CONCERNS & GRIEVANCE REDRESSAL MECHANISM

Anyone who suspects or becomes aware of any violations of the Code, Tata Communications' policies, or any of the commitments outlined in this statement have been informed that they should raise their concerns through one of the various channels outlined in the Company's [Whistleblower Policy](#). This includes the ability to report concerns confidentially and, if desired, anonymously through our third party-run whistleblower hotline which is available in multiple languages. We have published our Whistleblower Policy on the Company's website and publicized it across the organization through various trainings and communications to our workforce. Concerns can be raised to both, internal points of contact, as well as to external parties. Further for any feedback, queries or grievances related to our sustainability practices including Human Rights, the concerned team can be contacted at EOHS@tatacommunications.com

Employees of our UK entity can also refer to the grievance procedures outlined in the Tata Communications (UK) Limited Employee Handbook for details on the process of raising Human Resources-related concerns. As a Company, we are committed to ensuring that no one suffers any adverse employment action or detrimental treatment as a result of reporting concerns in good faith. Company personnel who violate our Company Policies or any of the commitments in this statement may be subject to disciplinary action which may include suspension and/or termination of employment, association or relationship with the Company, as well as any other rights or remedies that the Company may have. Questions about this statement should be directed to our Company's [Legal Compliance Team](#).

LOOKING FORWARD

We continue to work towards strengthening our approach to eliminating the risk of modern-day slavery arising within our business or supply chain, and to ensure that our strategy is responsive to changing risk environments. Tata Communications will continue to strengthen human rights integration across functions, supplier ecosystems, and stakeholder engagement platforms. With proactive governance, transparent disclosures, and continuous capacity-building, we aim to create a resilient, ethical, and inclusive business that upholds and advances human dignity at every level.

Signed by:

Troy Reynolds

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TROY REYNOLDS

Director, Tata Communications (UK) Limited

About Tata Communications

Tata Communications holds a comprehensive portfolio which spans next-generation connectivity, cloud services, customer interaction solutions, IoT, media services and cybersecurity, all underpinned by our robust global network infrastructure. Our digital fabric of solutions integrates advanced platforms, tools and technologies to simplify complexities and help enterprises unlock new possibilities in a rapidly evolving digital landscape.

Through our global network accessible from over 190 countries and territories, we enable seamless communication, secure data exchange and intelligent connectivity. Guided by our ethos of innovation and sustainability, we are committed to reducing environmental impact, promoting inclusive growth and creating long-term value for all stakeholders.
