

# **ANTI-HUMAN TRAFFICKING AND ANTI-MODERN DAY SLAVERY**

## **STATEMENT FOR FISCAL YEAR ENDING MARCH 31, 2016**

### **TATA COMMUNICATIONS' BUSINESS AND OPERATIONS**

Tata Communications (UK) Limited and its affiliates ("Tata Communications" or the "Company") owns and operates the world's largest fibre optic cable network, covering 240,000 kilometres, including the first and only fibre optic ring around the world. Our network travels over land and under the sea to link six continents and more than 200 nations and territories and accounts for over 20% of the world's Internet routes. Our network also carries 53 billion voice minutes per year, and 50% of the world's roaming traffic. Businesses all around the world depend on us not only for voice, Internet and data communications, but also for a wide range of communications services. These services include everything from networking, unified communications, and media services to cloud computing, data centres, and network security. We support everything through offices in 31 countries and one million square feet of data centre and collocation space in 44 locations around the world. Our company employs more than 8,000 people all over the world, with 30% of our employees located outside of India. Tata Communications works with many vendors and partners who provide crucial services and products to support our daily operations.

### **OUR COMMITMENT TO ANTI MODERN-DAY SLAVERY**

Modern-day slavery is a crime and a violation of fundamental human rights. It takes various forms, such as forced labour, 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 has a zero-tolerance approach to modern-day slavery. We are committed to ensuring that human trafficking does not occur in our workplace or within our supply chain. Tata Communications has instituted various policies and programs to establish the framework of our commitment to human rights and ethical behaviour in our work environment.

### **TATA GROUP VALUES**

Tata Communications' Values (Unity, Integrity, Responsibility, Understanding, and Excellence) are the foundation of our Company's ethical principles. Our Company recognizes the importance of treating our colleagues, vendors, contractors, stakeholders and other third parties with integrity and respect. This includes ensuring that our actions and the actions of our suppliers do not constitute any of the criminal acts of 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.

### **TATA CODE OF CONDUCT**

The main framework that outlines our Company's values and ethical stance is our [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:

*Everyone 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 anti-human trafficking:

*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.*

Tata Communications provides its employees with annual trainings on the Tata Code of Conduct, 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.

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

*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.*

We contractually require these third parties to agree to abide by the Code and the standards outlined in the Code. If the vendors' own Codes of Conduct align with ours, we will accept the vendors' commitment to their own Codes as an alternative.

### **GLOBAL DIGNITY IN THE WORKPLACE POLICY**

Tata Communications' "Global Dignity in the Workplace Policy" (the "Policy") further elaborates on the Company's commitment to eliminating all forms of bullying, discrimination, and retaliation in the workplace. This includes any actions that could amount to human trafficking, forced labour, and/or any other behaviours deemed to be modern-day slavery under applicable laws. The Policy applies to all workplaces, guests or visitors, employees, casual workers, contractors, probationers, apprentices, agents and representatives of the Company, whether working for remuneration or not, or working on a voluntary basis or otherwise. The Policy also applies to all of the Company's corporate offices and other Company workplaces.

In addition to the above-mentioned policies, Tata Communications' human resource policies ensure that our employees and contractors are hired and treated fairly and humanely during the course of their employment or contract with Tata Communications. This includes ensuring that the Company recruits, and compensates employees, contractors, and temporary workers in accordance with applicable laws. When allowed under local laws, Tata Communications also conducts background checks on prospective employees and contractors. 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 are outlined in the vendor agreements that are signed prior to their engagement.

Our company's Procurement Policy also ensures that we select vendors who are compliant with applicable legal and regulatory obligations, committed to ethical behaviour, and engage in fair market practices. These requirements are clearly outlined in the Policy, and the employees engaged in our vendor selection process are trained to ensure that they understand the nuances of these requirements. Those vendors who have found to be in violation of the Tata Code of Conduct, have engaged in unethical conduct, and/or have violated laws, are blacklisted from continuing to be our Company's supplier.

### **REPORTING CONCERNS**

Anyone who suspects or knows of any violations of the Tata Code of Conduct, 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 raise concerns to our third party-run whistleblower hotline that is available in multiple languages. We have publicized our Whistleblower Policy on our Company's website, and throughout various trainings and communications to our workforce. Concerns can be raised both to internal points of contact, as well as to external parties. 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.

Questions about this statement should be directed to our Company's [Legal Compliance Team](#).