

ANTI-HUMAN TRAFFICKING AND ANTI-MODERN DAY SLAVERY **STATEMENT FOR FISCAL YEARS 2017/2018**

TATA COMMUNICATIONS' BUSINESS AND OPERATIONS

Tata Communications Limited and its affiliates ("Tata Communications" or "Company") owns and operates the world's largest fibre optic cable network, covering 710,000 kilometres, including the first and only fibre optic ring around the world. Our network travels over land and under the sea to enable businesses to reach 240 countries and territories. This network also carries more than 25% of the world's Internet routes and 50 billion voice minutes per year. With a strong presence in both developed and emerging markets, Tata Communications is an enabler of digital transformation for global enterprises, offering a broad range of network, cloud, security, mobility and collaboration services. We have 295 offices in 39 countries, employing more than 10,000 people all over the world.

OUR COMMITMENT TO ANTI MODERN-DAY SLAVERY & COMBATting HUMAN TRAFFICKING

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, the procurement of commercial sex acts 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. 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 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.

Further, Tata Communications does not destroy, conceal or otherwise deny access to employee personal documents, such as passports or drivers' licenses.

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 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.

COMPANY POLICIES

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 compensation, on a voluntary basis or otherwise. The Policy also applies to all the Company's corporate offices and other Company workplaces.

Tata Communications' 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 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 comply 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 suppliers.

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. Company Personnel who violate our Company Policies or any of the commitments in this statement may be subject to disciplinary action, and this 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 against the defaulting employee.

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