



# **ANTI HUMAN TRAFFICKING AND MODERN SLAVERY STATEMENT**

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FOR FISCAL YEAR 2020/21

## 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 and its affiliates ("Tata Communications" or "Company") is committed to continually reviewing and improving our efforts to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes Tata Communications' slavery and human trafficking statement for the fiscal year end on 31 March 2021. The Act requires the Company to state the steps taken during the fiscal year 2020-21 to ensure that modern slavery and human trafficking are not taking place in our business operations and supply chains.

## 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 carries around 30% of the world's internet routes and connects businesses to 60% 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 more than 200 countries and territories. Tata Communications Limited is listed on the Bombay Stock Exchange and the National Stock Exchange of India.

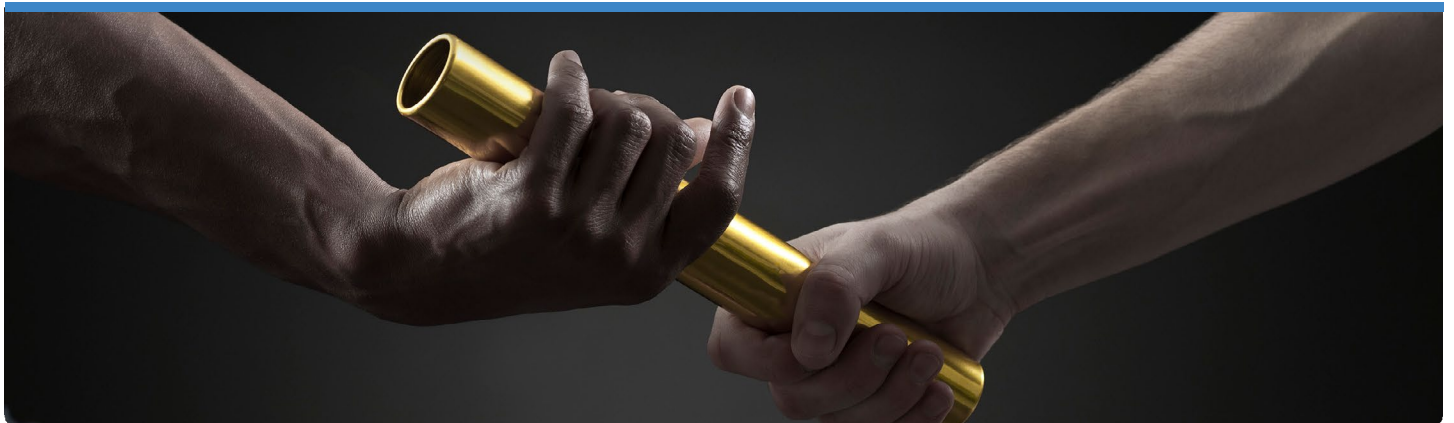
## OUR COMMITMENT TO COMBATTING MODERN-DAY SLAVERY & HUMAN TRAFFICKING

Tata Communications 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. 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.

Our policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to 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' Values (Unity, Integrity, Responsibility, Pioneering 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 involve 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.**

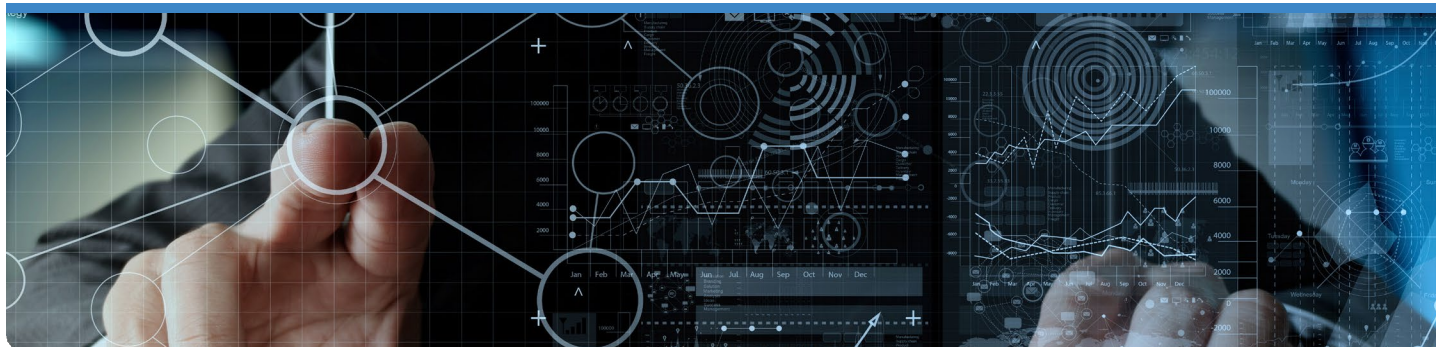
The Code also describes our commitment to combatting human trafficking and rejecting forced and child labour:

**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.**

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.**

We endeavor to 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. For further information on the structure of our supply chain, please visit the [Company website](#).

## 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 rights abuses including human trafficking, forced labour, and/or any other behaviours deemed to be modern-day slavery under applicable laws.

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 is 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, are committed to ethical behaviour, and engage in fair market practices. These requirements are clearly outlined in the Procurement 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 are found to be in violation of the Code, to have engaged in unethical conduct, or to have violated laws, are blacklisted from continuing to be our Company's suppliers. We also conduct background screenings on Third Party Intermediaries that represent us and our brand to make sure that their values align with our own.

## HIGHLIGHTS OF FY 2020/21

During the financial year 2020/21, as part of the human rights impact assessment initiated in the previous financial year, the Company successfully completed the virtual workshops held by an external business and human rights consultant ('consultant') with relevant stakeholders. This assessment enabled the stakeholders to have deeper insights on the topic and identify key concerns over the course of the workshops. As an outcome of the assessment, the consultant provided a recommendation report ('Report') to facilitate the Company to strengthen its existing processes and framework. Ever since, the Company has constantly demonstrated its efforts to integrate and take necessary steps in preventing and mitigating human rights issues. One of the pertinent recommendations from the Report was to introduce and effectively implement a vision statement on Network Shutdown based on best practices in the ICT sector for combating conflicting situations between adhering the domestic law(s) and respecting human rights. As a result, the Company published a standalone [Network Shutdown Policy](#) ('Policy') to describe our network management and human rights commitments thereby achieving maximum transparency. The Policy is aligned with the principles contained in the Universal Declaration of Human Rights<sup>(1)</sup>, International Labour Organisation Declaration on Fundamental Principles and Rights at Work<sup>(2)</sup> and the United Nations Guiding Principles on Business and Human Rights<sup>(3)</sup> and is consistent with the [Tata Code of Conduct](#).

Additionally, the Company also conducted an internal gap assessment to confirm our adherence with the Tata Group draft Tata Business and Human Rights Policy (TBHRP). The gap assessment tool was designed to help business functions understand and identify potential human rights violations caused by the effect of their operations on employees, residents and other stakeholders, including suppliers and customers. This tool included due diligence on all plausible human rights aspects (including adherence to existing frameworks – policy, process, governance, reporting and disclosure mechanism) such as health and safety, supply chain, clean air and water, child labour, forced labour, fair wages, data security and privacy, land rights and resettlement and non-discrimination. The results reinforced that all the above aspects are relevant, but the risk had minimal to low impact for the Company given our adherence to established and streamlined policies and processes.

Furthermore, the Company continues its efforts to assess and analyse specific human rights risks associated with labour, and to ensure that our vendors adhere to promote safe and fair working environment along with responsible management of social, ethical and environmental issues in Company's supply chain. We are committed to ensuring that the fundamental rights of people engaged in our operations across the value chain are in no way violated. For more details on Company's management approach and performance on the subject, please refer to our [Sustainable Development Report 2021](#).

(1) Universal Declaration of Human Rights- <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

(2) International Labour Organization Declaration on Fundamental Principles and Rights at Work - <https://www.ilo.org/declaration/lang-en/index.htm>

(3) United Nations Guiding Principles on Business and Human Rights - [https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf)

## LOOKING FORWARD

In financial year 2021/22, we will continue to strengthen our approach to eliminating the risk of modern-day slavery arising within our business and supply chain and to ensure our strategy is responsive to changing risks through a number of initiatives including revisiting the Human Rights Assessment with reference to Tata Business and Human Rights Guidance Note. At the same time, we will continue working with our key stakeholders on any recommendations and opportunities for improvement that might arise out of the assessment.




## REPORTING CONCERNS

Anyone who suspects or knows 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 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.

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

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### TROY REYNOLDS

Director, Tata Communications (UK) Limited.

## About Tata Communications

Tata Communications is a leading global Digital Ecosystem Enabler that powers today's fast growing digital economy.

The company's customers represent 300 of the Fortune 500 whose digital transformation journeys are enabled by its portfolio of integrated, globally managed services that deliver local customer experiences. Through its network, cloud, mobility, Internet of Things (IoT), collaboration and security services, Tata Communications carries around 30% of the world's internet routes and connects businesses to 60% of the world's cloud giants and 4 out of 5 mobile subscribers.

The company's capabilities are underpinned by its global network. It is the world's largest wholly owned subsea fibre backbone and a Tier-1 IP network with connectivity to more than 240 countries and territories.

Tata Communications Limited is listed on the Bombay Stock Exchange and the National Stock Exchange of India and is present in over 200 countries and territories around the world.

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