

# **TATA Consultancy Services Limited and associated subsidiary Group Companies**

## **Modern Slavery Act Statement**

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VERSION 1.0

## ***Introduction***

This statement sets out the steps that we, TATA Consultancy Services Limited, and all of our wholly owned subsidiary companies will take to ensure that slavery and human trafficking is not taking place in any part of our supply chains or in any part of our business.

References to slavery and human trafficking are based on the definitions set out in the Modern Slavery Act 2015 and guided by the UN Universal Declaration of Human Rights and the conventions of the International Labour Organisation (ILO), particularly relating to forced or compulsory labour.

We will review our practices annually. Where a specific improvement need is identified, we will implement where necessary further procedures to supplement our existing processes and policy.

This statement is applicable and effective immediately and until 31<sup>st</sup> March 2018. It will be updated annually thereafter.

## ***TATA Code of Conduct***

For over 100 years, the TATA group has been led by visionaries who have stayed true to the vision of the founder, Jamsetji Tata. His vision placed the greater good of society at par with business growth and the implementation of practices that pioneered social initiatives that changed the way responsible business was run. That vision still holds good today and reflects in all TATA group Companies' strong social conscience in all that they do. The TATA group philosophy of management has always been, and is today more than ever, that corporate enterprises must be managed not merely in the interests of their owners, but equally in those of their employees, of the consumers of their products, of the local community and finally of the country as a whole.

This Code is a living document. While it has remained unaltered in its essence, it has been amended over the years to stay aligned with changing cultural and regulatory norms across the multiple jurisdictions in which we conduct our business. The Code is intended to be a contemporary and relevant guide for our times. It cannot, however, provide an answer to all possible questions or ethical dilemmas that may arise. All of our employees are expected to act with compliance and integrity in accordance with the standards of behaviour set out in the Code of Conduct and provide a signed deed of acceptance to this on their joining as employees of the organization. Related compulsory training is administered as part of the employee induction process.

Referring to matters affecting the eradication of slavery and human trafficking from taking place in any part of our business affairs, the Code makes clear that as an organization, we do not employ children at any of our workplaces and 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 anyone else in order to secure employment with us, or to work with us. Whilst we support the development and operation of competitive open markets and the liberalisation of trade and investment in each country and market in which we operate, we shall not enter into any activity constituting anti-competitive behaviour such as abuse of market dominance, collusion, participation in cartels or inappropriate exchange of information with competitors. We are committed to good corporate citizenship, and shall actively assist in the improvement of the quality of life of the people in the communities in which we operate.

Referring to matters affecting the eradication of slavery and human trafficking from taking place in any part of our supply chain, we only seek to work with suppliers and service providers who can demonstrate that they share similar values to our own, and we expect them to adopt ethical standards comparable with our own at all times.

In essence, ethical behaviour in business, in every sphere and with all constituents, has been the bedrock on which the TATA group has built, and operates, its enterprises. This has been an article of faith for the group ever since its inception and a fundamental element of our cherished heritage and the essence of our way of life.

## **1. Overview and how we define Modern Slavery**

**1.1** - Slavery, child labour and human trafficking are serious crimes and a violation of fundamental human rights. There are various forms of this 'Modern Slavery' which deprives victims of their liberty and usually involves financial exploitation.

**1.2** - At TATA Consultancy Services Limited and associated subsidiary Group companies, we conduct our business fairly, ethically and with respect to fundamental human rights. We are fully committed to the prevention of all forms of slavery, forced labour or servitude, child labour and human-trafficking, both in our business and in our supply chains. We will not tolerate it.

**1.3** - This policy does not form part of our employee's contract of employment, and we reserve the right to amend, update and refresh this policy at any time.

**1.4** - All of our associates are required to read and comply with this policy if they work for, or on behalf of the Company in any capacity including as: an employee, director, officer, worker, consultant, volunteer, supplier or service provider or in any other capacity not already mentioned.

**1.5** - The Company's Anti-Slavery Officer ('ASO') is responsible for this policy.

**1.6** - Failure to comply with this policy may result in disciplinary action, including dismissal, or termination of the contract between the associate and / or Company. It could also involve other legal steps being taken against the offending party.

## **2. Preventing slavery and human-trafficking in our business**

**2.1** - The Company makes appropriate checks on all employees, recruitment agencies, directors, officers, workers, consultants, volunteers, suppliers or service providers, to know who is working for, or on behalf of us.

**2.2** - The Company provides every employee with a written contract of employment. We pay every employee in accordance with the law. We comply with our legal obligations to ensure the health and safety of all of our employees and workers, including in relation to working hours, rest breaks and holidays are upheld at all times.

***3. All of our Suppliers are required to and are aware of***

**3.1** – When supplying the Company with goods or services, they must assess their business and supply chains and confirm to our ASO that they comply with their legal obligations, in relation to Modern Slavery, and are committed to ensuring there is no slavery, forced labour or servitude, child labour or human trafficking taking place in their business, or any of their supply chains. They must also provide a copy of their anti-slavery policy to the Company on engagement and no less than annually thereafter.

**3.2** - If they breach this policy, or are found to have slavery or human-trafficking in their business, or knowingly in their supply chain, the Company may terminate the contract for services with immediate and pursue its legal remedies against the supplier concerned.

***4. All of our Employee or Worker providing services for us are aware of***

**4.1** – They must immediately report any suspicions of Modern Slavery or human-trafficking in our business or supply chains to our ASO. Our ASO will investigate and report to our Board of Directors, within a reasonable time, on actions which may require to be taken.

**4.2** – They will not suffer any detrimental treatment as a result of reporting any genuine concerns, raised in good faith, under this policy. This applies, even if after investigation, they are found to be mistaken. If an employee and / or worker believes that they have suffered such treatment on doing so, they should immediately inform our ASO and if they are an employee, refer to our Grievance and Whistleblowing Policies.

**Mr. S. Balasubramanya**  
**Chief Compliance Officer**

***Authorised for and on behalf of TATA Consultancy Services Ltd and all of its subsidiaries***