



# Tata Consultancy Services Limited and its Subsidiary Companies

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Statement on prevention of modern slavery  
and transparency in supply chain

# Applicability

This **Statement on Prevention of Modern Slavery and Transparency in Supply Chain** is applicable to Tata Consultancy Services Limited and its wholly owned subsidiary companies (henceforth referred as TCS or Tata Consultancy Services) across the world. However, if any wholly owned subsidiary has published its own Statement, the same shall override this Statement in respect of that subsidiary.

## Introduction

TCS is an IT services, consulting and business solutions organisation that has been partnering with many of the world's largest businesses in their transformational journeys for over fifty-five years. TCS is part of the Tata group, a multinational conglomerate founded more than 150 years ago, led by inspiring leaders 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 pioneered social initiatives that changed the way responsible business was run. The Tata group philosophy of management has always been 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 nation as a whole.

TCS operates in over 55 countries through its Branches and Subsidiaries with a global workforce, developing software and delivering services to customers through the unique Location Independent Agile™ delivery model.

At TCS, we believe in building greater futures for people and communities through innovation and collective knowledge. Human rights are enshrined in TCS' core value of 'Respect for the individual' and upholding of human rights is an integral aspect of the way we conduct our business, treat our employees and support the communities where we live and work. Our approach starts from respecting and protecting human rights in every aspect of our business and supply chain, and remediating any adverse human rights impact that may be resulting from or caused by our operations. Modern Slavery is a term under Human Rights that

is used to describe serious exploitation of people. It includes human trafficking, slavery, servitude, forced or compulsory labour, debt bondage, child labour, securing services by threat or deception and so on. Acknowledging the prevalence of modern slavery across the globe, TCS is taking appropriate steps to prevent and address the concerns of modern slavery within its scope of business.

References to modern slavery and human rights are based on the definitions set out in applicable regulations across the globe such as the UK Modern Slavery Act 2015, the Australia Modern Slavery Act, 2018, the Norwegian Transparency Act, the EU Corporate Sustainability Due Diligence Directive and those of other countries where we operate, and guided by the UN Universal Declaration of Human Rights (UDHR) and the conventions of the International Labour Organization (ILO), particularly relating to forced or compulsory labour.

This statement sets out the steps that we, Tata Consultancy Services, have undertaken during the 2023-24 fiscal year that ended on 31 March 2024, to identify potential threats of modern slavery and other human rights violations and to the best of our ability prevent the existence of such violations within our internal operations, within any stage of our product and services operations and within local and global supply chains. With numerous suppliers across geographies, TCS takes a risk-based approach to the same.



# Tata Code of Conduct

We are governed by the [Tata Code of Conduct \(TCOC\)](#), which represents the values and core principles that guide the conduct of every Tata business. The TCOC makes it clear that as an organisation, we respect the human rights and dignity of all our stakeholders. 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 others to secure employment with us, or to work with us. We strive to provide a safe, healthy and clean working environment for our employees and all those who work with us.

With respect to our supply chain, we only seek to work with suppliers and service providers who share similar values to our own, and we expect them to always adopt ethical standards comparable with our own.



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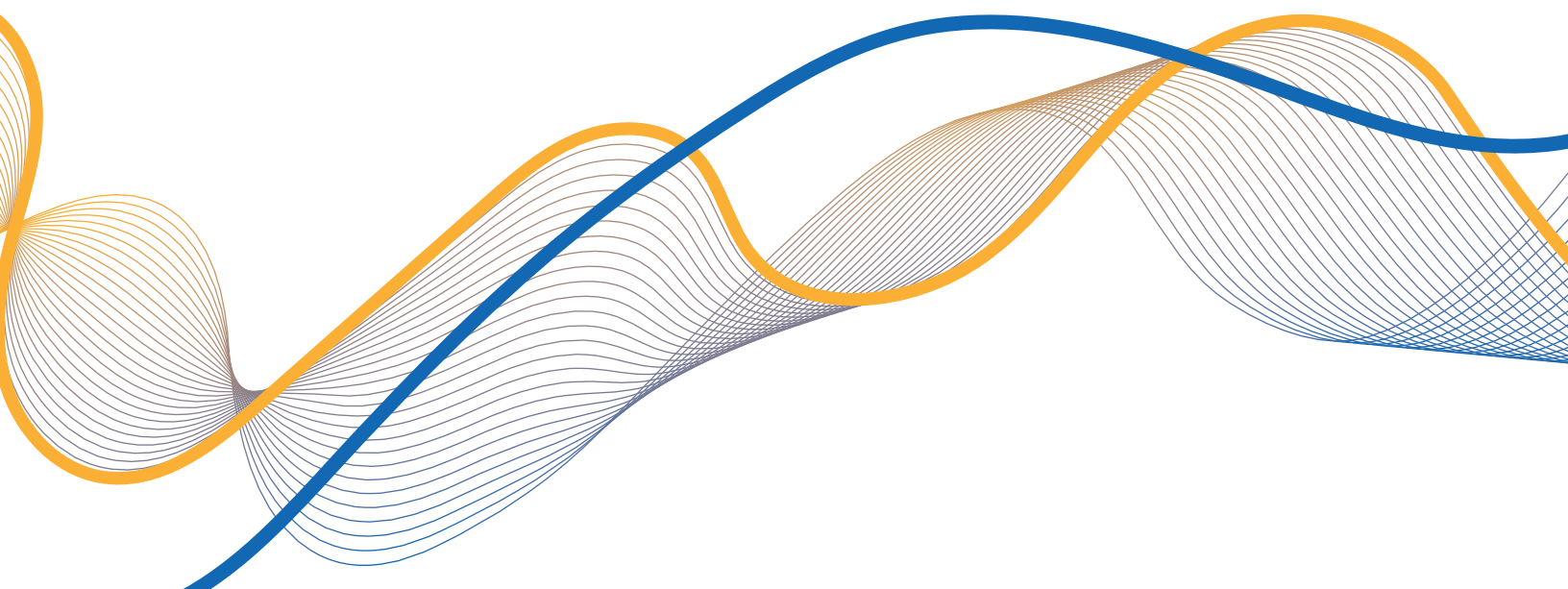
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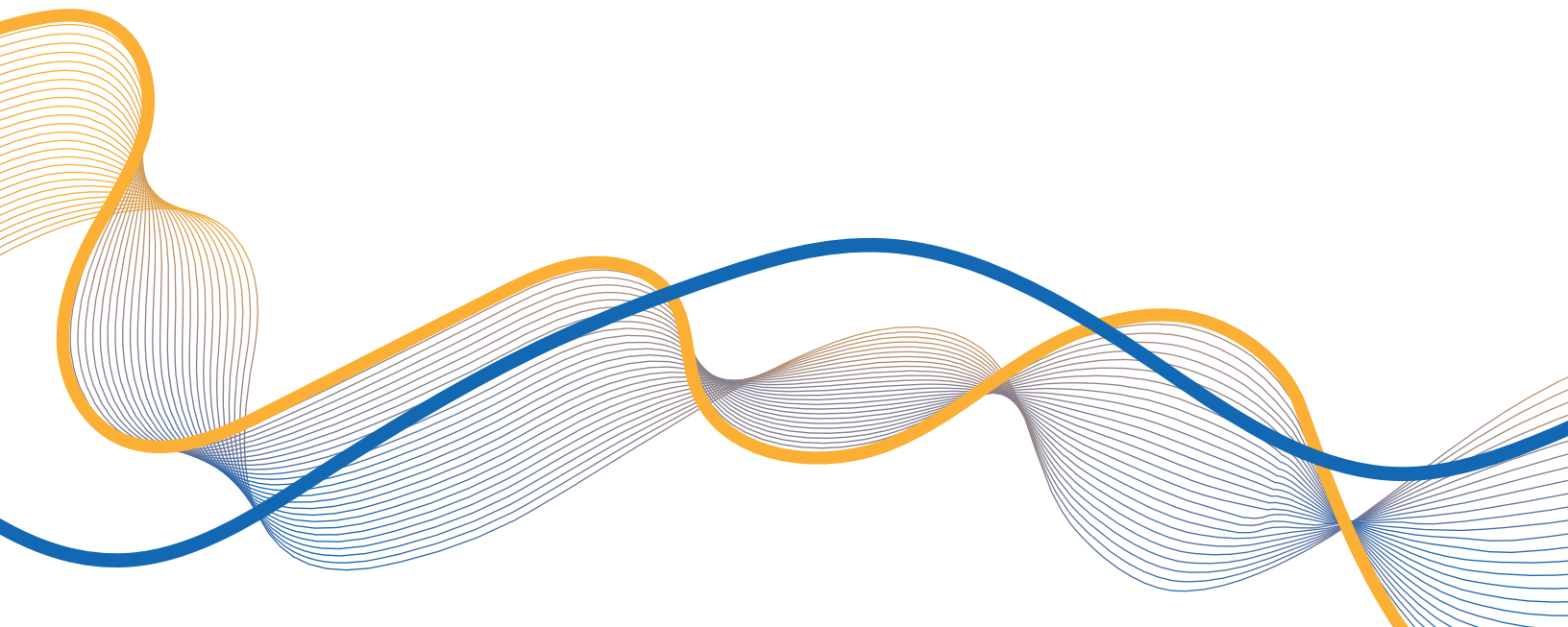
## 1

# Preventing slavery and other human rights violations in our business

- 1.1 Slavery, child labour and human trafficking are serious crimes and a violation of fundamental human rights. At Tata Consultancy Services, 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 do not tolerate any of these violations.
- 1.2 TCS provides every employee with a written contract of employment. We pay every employee in accordance with the law.
- 1.3 TCS has been a signatory of the UN Global Compact (UNGC) since 2006, which confirms our commitment to the Ten Principles of the United Nations in the areas of human rights, labour, environment and anti-corruption. TCS supports the principles contained in the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. Our policies are endorsed by senior management and specify expectations from employees, suppliers and business partners.
- 1.4 TCS provides a safe and healthy working environment for its employees and other stakeholders who work with us. We comply with our legal obligations to ensure the health and safety of all our employees, including in relation to working hours, rest breaks and holidays. We foster a conducive work environment built on inclusion, tolerance, understanding, cooperation and respect for individual privacy.
- 1.5 TCS makes appropriate checks in line with applicable laws on all directors, officers, employees, business associates, consultants, volunteers, recruitment agencies, suppliers or service providers, to identify compliance risks.
- 1.6 We seek relationships with suppliers who share a common commitment to ethical and lawful behaviour. This is reflected in the [TCS Supplier Code of Conduct](#) and the [Sustainable Supply Chain policy](#).
- 1.7 TCS undertakes due diligence when appointing new suppliers and regularly reviews existing suppliers. TCS' risk assessment process considers supplier Country Risk information, (available from numerous sources such as Freedom House, Transparency International Corruption Perception Index, Trafficking in Persons Report and the Global Slavery Index), the operating structure of the supplier, volume of business, category of business, financial information, and any other public information available. Risk assessment and periodic monitoring are done for high-risk suppliers, and TCS reserves the right to audit any supplier as required.
- 1.8 We continuously track regulatory changes in this regard to ensure that our policies and processes incorporate the required compliance obligations, and we stay compliant. Compliance monitoring, internal audits and governance through compliance committees provide assurance on TCS' compliance.
- 1.9 Failure to comply with our compliance policies may result in disciplinary action, including termination of the contract between the associate and / or Company. It could also involve other legal steps being taken against the offending party.

## 2 TCS Supply Chain and Standards for Suppliers

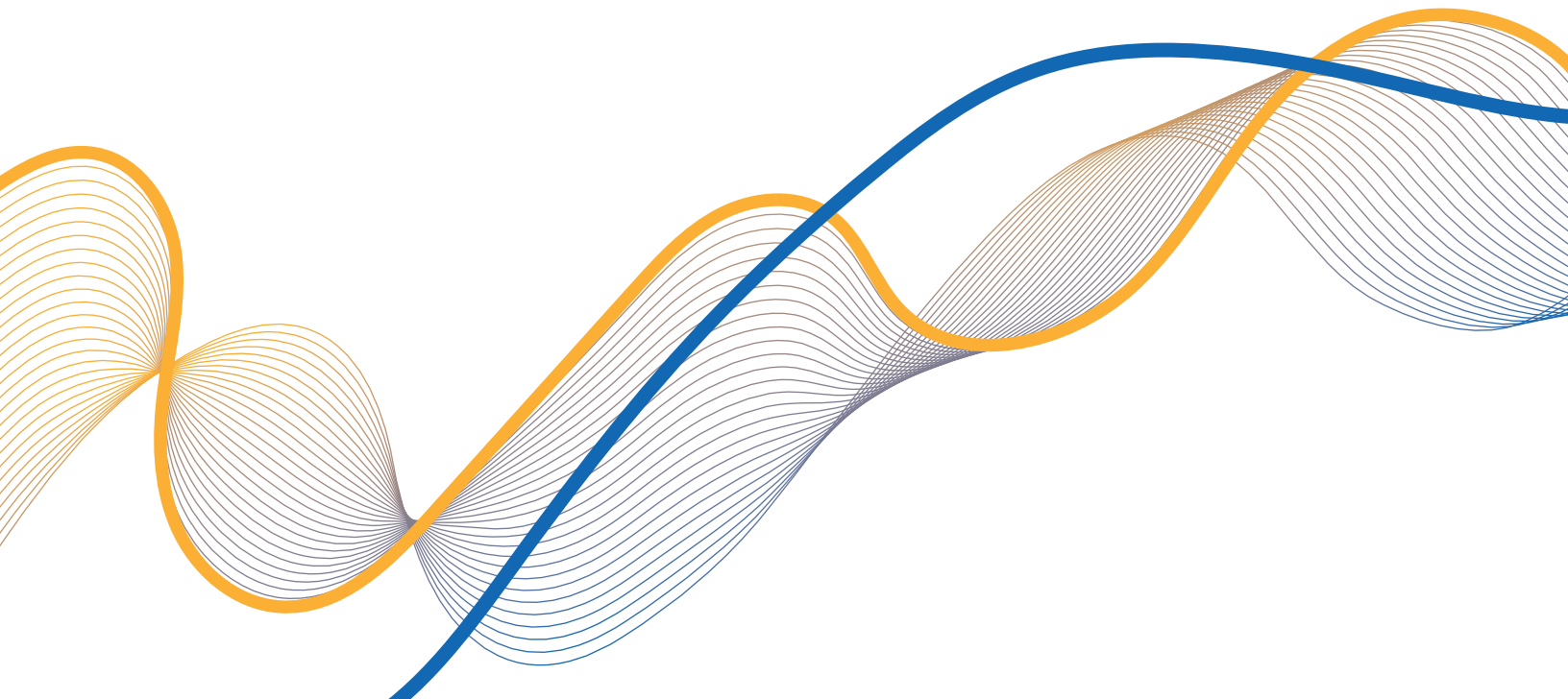
- 2.1 Our supply chain includes suppliers of IT related Products and Services (e.g., hardware, software, IT services), other products and services (e.g., stationery, cafeteria services, security services, transportation, infrastructure etc.) and people (e.g., contractors, business associates etc.).
- 2.2 All Suppliers must abide by the [TCS Supplier Code of Conduct](#) published on the TCS website. It clearly articulates that the Supplier shall not employ children and shall not use forced or slave labour of any type. It is communicated to all Suppliers through purchase orders and contracts, and through the TCS website.
- 2.3 Our suppliers must assess their business and supply chains and on on-boarding, confirm that they comply with their legal obligations, in relation to Human Rights, including Modern Slavery, and are committed to ensuring there is no slavery, forced labour or servitude, child labour or other human rights violations taking place in their business, or any of their supply chains.
- 2.4 TCS has embarked on an improved supplier Sustainability assessment program through an independent and globally recognised supplier Environmental, Social and Governance (ESG) assessment platform. Suppliers will now be required to report their ESG performance covering themes of environment, labour and human rights, ethics, and sustainable procurement. This program is being driven in a phased manner beginning with our top critical suppliers.
- 2.5 If a supplier does not comply with the Supplier Code of Conduct or is found to have practiced slavery or violated other human rights in their business, or knowingly in their supply chain, TCS may terminate the contract with immediate effect and pursue legal remedies against the supplier concerned.
- 2.6 All suppliers are given details of whom to report ethical concerns to within our company through the Supplier Code of Conduct. All such concerns would be investigated as applicable.



## 3

# TCS Standards for Associates and Others providing services

- 3.1 All our policies and this statement are published on an internal portal and our associates are informed, so that they can familiarise themselves with the same. This statement is also made available on the TCS website for all others providing services in any capacity including as: director, officer, consultant, volunteer, supplier or service provider or in any other capacity not already mentioned.
- 3.2 All our associates are expected to act with compliance and integrity in accordance with the standards of behaviour set out in the Tata Code of Conduct. Each associate provides a signed deed of acceptance to this on joining the organisation. Related compulsory training is administered as part of the employee induction process. Training in geography specific Labour Laws is provided to the associates, as required. Associates are encouraged to review and continuously familiarise themselves with the company policies on conduct, ethics and whistleblowing.
- 3.3 They must immediately report any suspicions of Modern Slavery or other human rights violations in our business or supply chains through the Ethics Concern reporting portal or write to [corporate.compliance@tcs.com](mailto:corporate.compliance@tcs.com). We will investigate and report to the Management and if required to the Board of Directors, within a reasonable time, on actions that may be required to be taken.
- 3.4 They will not suffer any detrimental treatment as a result of reporting any genuine concerns raised in good faith. This applies, even if after investigation, they are found to be mistaken. If an associate believes that he / she has suffered such treatment on doing so, then the associate should immediately refer to our Grievance procedures for reporting and use the [Whistleblower Policy](#) for protected disclosures, if required.





## 4 Applicability in Australia

Representatives of the entities in Australia have been involved in the preparation of this Statement. TCS is committed to comply with the provisions of the Australia Modern Slavery Act, 2018. This Statement is submitted to the prescribed Authority in Australia and is applicable to our entities as given here under:

Name of Entity	Name of Parent Company	Company Registration Number	% of Shareholding	Applicability of this Statement
Tata Consultancy Services Limited registered as a foreign company in Australia	Entity is a Branch of Tata Consultancy Services Limited	ABN 28 109 981 777	Not applicable	Y
TCS FNS Pty Limited	Tata Consultancy Services Limited	ABN 45 116 714 482	100%	Y
TCS Financial Solutions Australia Pty Limited	TCS FNS Pty Limited	ABN 20 001 899 369	100%	Y

Other Subsidiaries of Tata Consultancy Services Limited may be referred to in its [Annual Report for 2023-24](#).

TCS entities in Australia had taken significant additional steps over and above global actions in 2022-23 to identify the areas of risk of modern slavery within its operations and its supply chains.

### Specific additional actions taken in the Australian entities in 2023-24 over and above global actions include:

- **Governance & Review:** Modern Slavery Management Committee convened its annual meeting to review the processes followed throughout operations in Australia in FY 2024 and progress made in ensuring ongoing compliance. A meeting on modern slavery compliance and subcontracting management process was held with top leadership and chaired by the Head of the region. Possible risks of modern slavery within our supply chain, and mechanisms to identify, prevent and mitigate them timely were discussed. The Subcontracting process document was created and published across all business units to bring clarity.

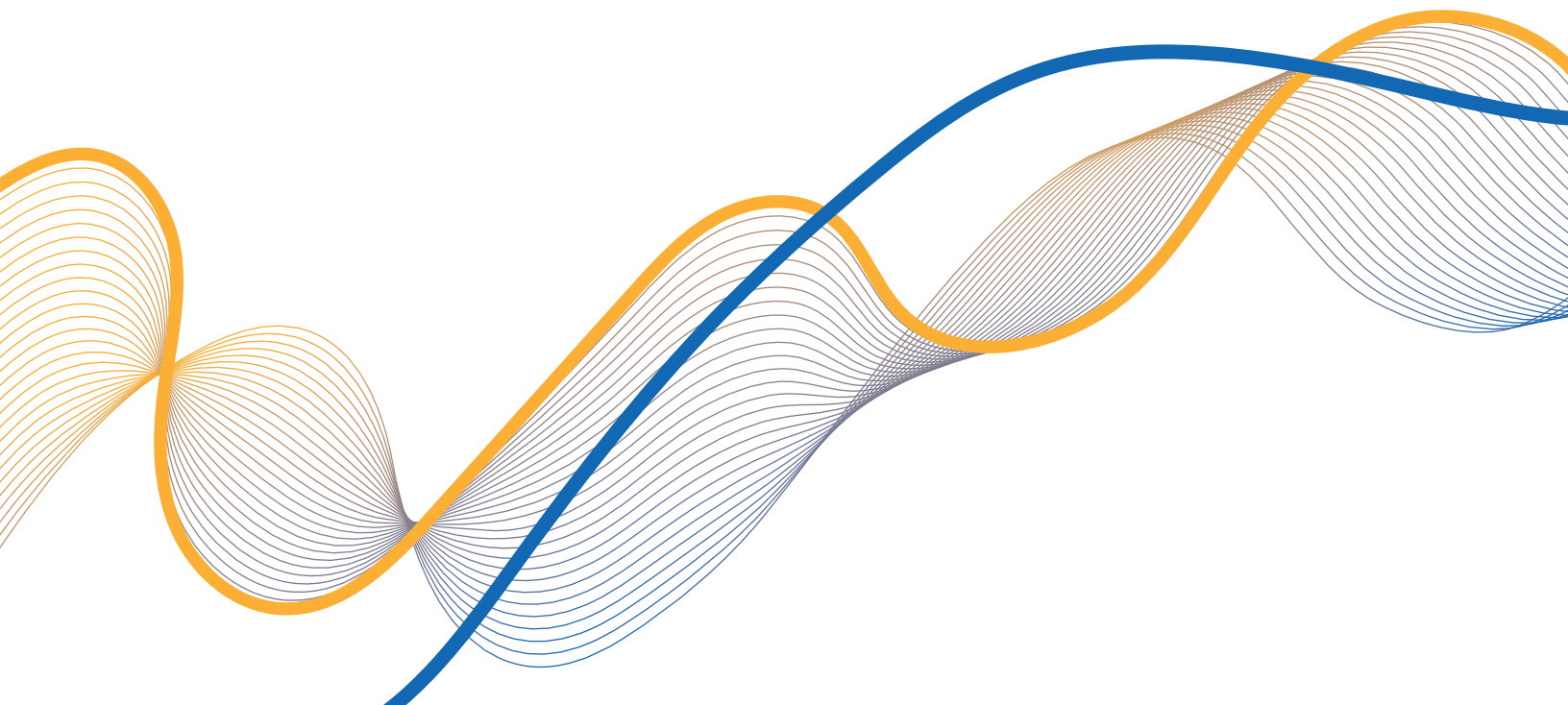


- Management Systems: TCS modern slavery management systems (established in previous reporting periods) continue to evolve and form the basis of managing all modern slavery aspects.
- Training: The updated web-based training pack continues as an awareness tool across TCS Australian operations for associate education. Modern slavery awareness is encouraged as a conversational tool in all discussions concerning engagement of new suppliers and management of existing suppliers.
- Due Diligence and Risk Management activities: Our modern slavery new supplier screening tool and processes, along with minor updates to the modern slavery self-assessment questionnaire and distribution processes, are in place. The screening and analysis of the responses received from our supply chain members is completed with no risks identified.
- Grievance and remediation: The grievance and remediation process is in place, however, there were no incidents in FY 2024.
- Effectiveness: Continues as per prior period and is reviewed to ensure better outcomes year on year.

#### Audit of TCS Australia operations:

- Desktop audits/reviews were continued, covering in-depth assessment of recruitment practices, review of payroll and data sampling of personnel files, and no evidence of modern slavery exists in any of the areas. TCS entities in Australia will continue with these reviews on a periodic basis.

The activities for 2024-25 will continue to build on the activities currently being undertaken. It is proposed to have more focus on governance, digitization, training and awareness building within the organisation and in the supply chain to ensure compliance with Modern Slavery law.





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## Applicability in Norway

This year Norway has published the Norway Statement on the TCS Europe portal and can be accessed through

**NORWEGIAN TRANSPARENCY ACT STATEMENT 2024**

## 6

# Applicability in UK

Representatives of the entities in UK have been involved in the preparation of this Statement. With reference to the UK Modern Slavery Act 2015, this Statement is applicable to our entities in the UK as given hereunder:

Name of Entity	Name of Parent Company	Company Registration Number	% of Shareholding	Applicability of this Statement
Tata Consultancy Services Limited registered as a foreign company in UK	Entity is a Branch of Tata Consultancy Services Limited	Foreign Company No. FC025271 UK branch registration No. BR007627	Not applicable	Y
Tata Consultancy Services UK Limited (previously W12 Studios Limited until May 24, 2021)	Tata Consultancy Services Limited	08055387	100%	Y
Diligenta Limited	Tata Consultancy Services Limited	05535029	100%	N (Refer to Diligenta website)

Other Subsidiaries of Tata Consultancy Services Limited may be referred to in its [Annual Report for 2023-24](#).

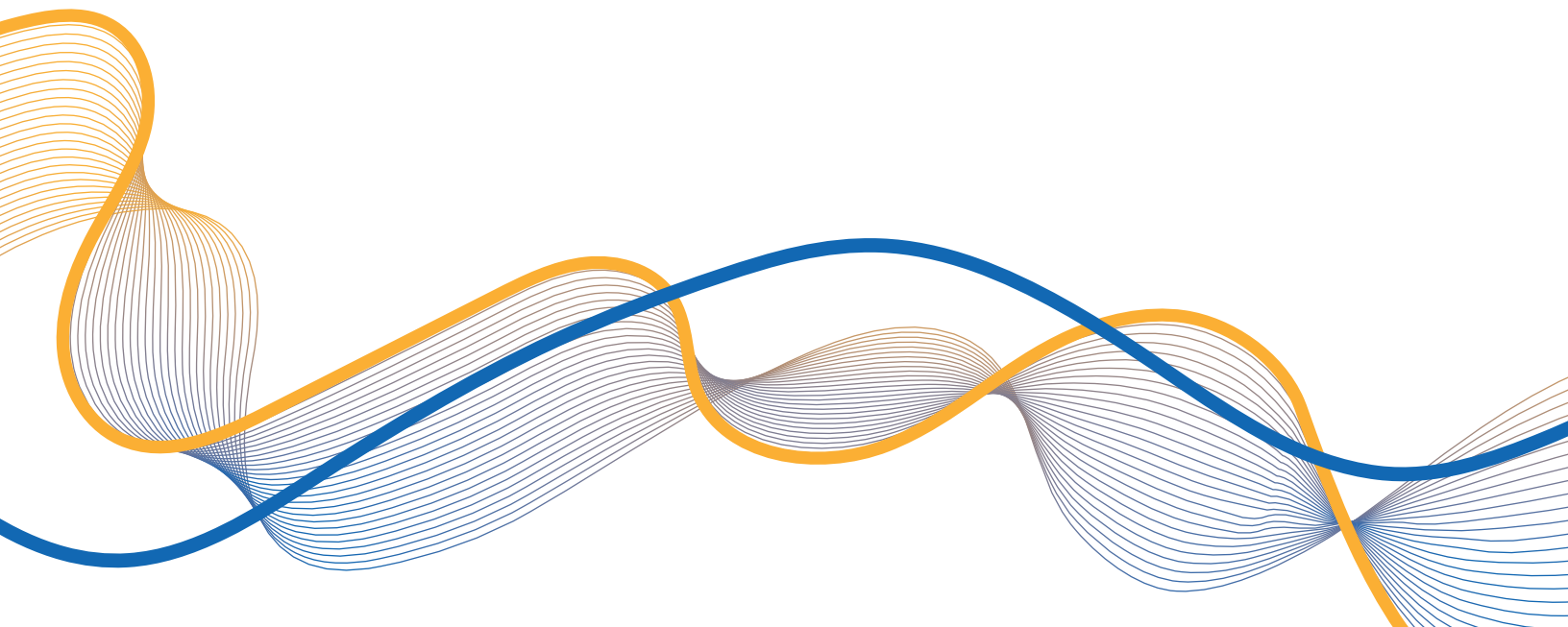
Specific additional actions taken in the UK entities in 2023-24 over and above global actions include the following:

- The Anti-slavery Working Group consisting of representatives from the Employee Relations, HR Compliance and HSE team continues to focus on improving internal processes and practices to mitigate the risk of human exploitation, trafficking, or modern slavery within TCS UK and Ireland and its supply chain.
- We have become an accredited Living Wage Employer with the Living Wage Foundation, UK. The accreditation reinforces our commitment to paying fair wages based on the cost of living. All our staff in the UK receive at least the Real Living Wage. We review our pay rates annually to ensure that the minimum rates meet the living wage requirements.
- We have identified Facility Managers at all our facilities in UK and Ireland. They have been provided with additional training on applicable legislation, how to spot signs and report concerns.
- We have reviewed and updated our ethics and compliance training course for managers to include additional awareness on human rights and modern slavery.

- In our internal operations, our Background Check process applies to all permanent and non-permanent staff that we recruit, including temporary staff and contractors. This process upholds our respect for labour rights and, for our UK employees, includes the verification of individuals' right to work in the UK.
- We continue to raise staff awareness on the subject and how to report concerns through our employee induction and other internal communication channels.
- Supplier risk assessment (Stage 1 Assessment) is conducted annually for all suppliers of products and services procured by TCS. Our supplier risk assessment process categorizes and identifies suppliers for additional assurance evaluations (Stage 2 Assessment). The evaluations include verification of steps taken by our suppliers to prevent modern slavery in their operations as well as in their supply chains. TCS reserves the right to undertake supplier audits.
- We have completed the annual Stage 1 Assessment for our suppliers and no supplier has been identified as high-risk. Stage 2 Assessment has been undertaken for all priority suppliers identified based on a final residual risk ranking. All priority suppliers have completed the supplier evaluation that assesses them on health, safety, social and environmental parameters. The supplier evaluations have not revealed any significant risks of modern slavery.
- Supplier Contracts include a clause on supplier's responsibility towards prevention of modern slavery in compliance with the Act. Adherence to our Code of Conduct always whilst providing goods and/or services to TCS is a mandatory requirement and our suppliers reaffirm their adherence and agreement to our Code of Conduct (including amendments as applicable) annually as part of the supplier assessments.

There have been no instances or suspected instances of modern slavery, identified or received through any of the reporting channels in the past year. We understand the imperative to maintain focus and continually review the steps we take to ensure we maintain a slavery free business and supply chain. We will continue to build on the above activities in 2024-2025 with a special focus on the following:

- Implement a plan to ensure that suppliers working on our office sites meet the Living Wage rates.
- Create an internal web-based Modern Slavery training pack to provide additional training and periodic refreshers to frontline staff.
- Review and update induction and other employee training and communication material to ensure that the information and guidance provided to employees is up to date.



# 7 Effectiveness of actions and residual risk

TCS is in the knowledge-based industry and its activities involve low risk of Modern Slavery and adverse working conditions. TCS continues to promote respect for fundamental human rights and decent working conditions within its scope of business and addresses it through the Code of Conduct, Policies and Procedures. As regards our supply chain, our engagement process with them and the Codes governing their appointment we ensure that the risk of Modern Slavery and adverse consequences to human rights and working conditions are minimal.

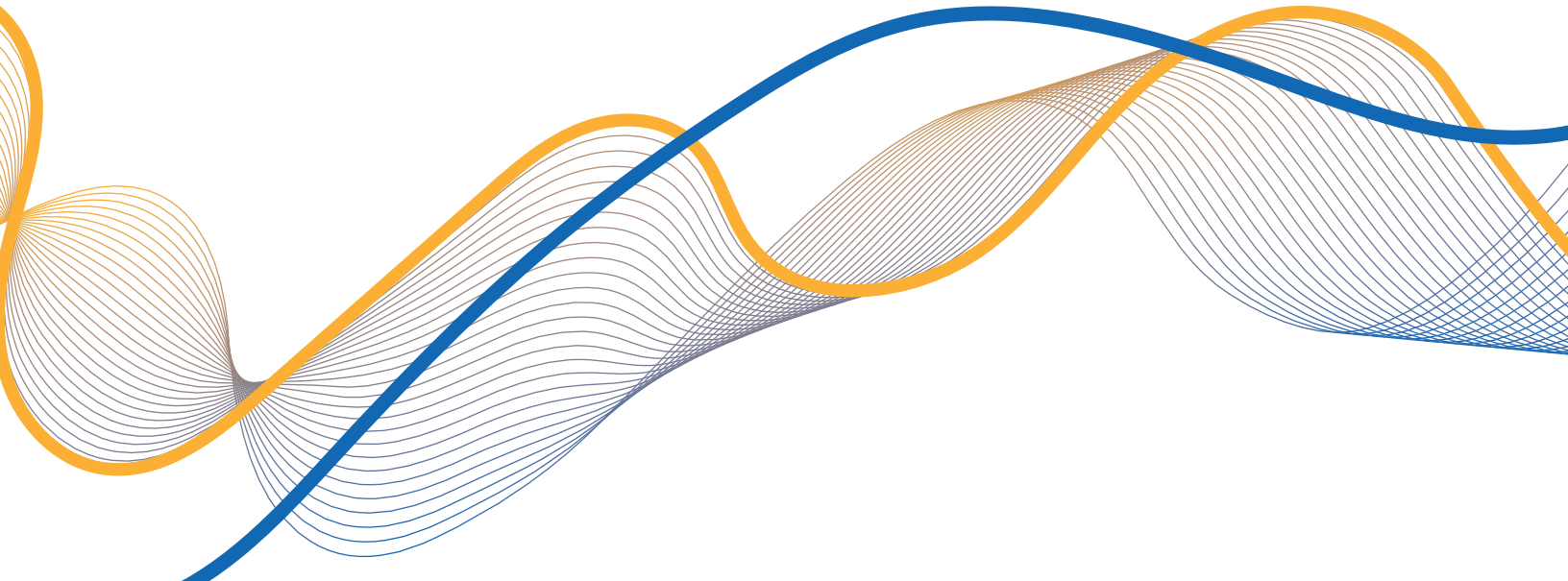
To address any residual risk, TCS is continuously reviewing policies and procedures for improvement, and assessing the effectiveness of measures taken in this regard on an ongoing basis using the following key performance indicators:

- Associate training
- Actions taken based on effective supply chain auditing and verification
- Observations from Internal Audits
- Investigations and outcomes of reports of Modern Slavery and Human Rights violations in the operations or in the supply chain, if any.

This statement is approved on 20/09/2024 and is signed by,

**Milind Lakkad**

Chief Human Resources Officer



### **About Tata Consultancy Services Ltd (TCS)**

Tata Consultancy Services is an IT services, consulting and business solutions organization that has been partnering with many of the world's largest businesses in their transformation journeys for over 56 years. Its consulting-led, cognitive powered, portfolio of business, technology and engineering services and solutions is delivered through its unique Location Independent Agile™ delivery model, recognized as a benchmark of excellence in software development.

A part of the Tata group, India's largest multinational business group, TCS has over 601,000 of the world's best-trained consultants in 55 countries. The company generated consolidated revenues of US \$29 billion in the fiscal year ended March 31, 2024, and is listed on the BSE and the NSE in India. TCS' proactive stance on climate change and award-winning work with communities across the world have earned it a place in leading sustainability indices such as the MSCI Global Sustainability Index and the FTSE4Good Emerging Index.

For more information, visit [www.tcs.com](http://www.tcs.com)

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