

Tata Consultancy Services Limited and its Subsidiary Companies

Modern Slavery Act Statement

Applicability

This Statement on Modern Slavery 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 on Modern Slavery, the same shall override this Statement in respect of that subsidiary.

Introduction

TCS is an IT services, consulting and business solutions provider that has been partnering with the world's largest businesses in their transformation journeys for the last fifty years. TCS is part of the Tata group, a multinational conglomerate founded 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.

This statement sets out the steps that we, Tata Consultancy Services, have undertaken during the 2019-20 fiscal year that ended on the 31st of March 2020, to ensure that modern slavery and human trafficking is not taking place in any part of our supply chains or in any part of our business. References to modern slavery and human trafficking are based on the definitions set out in applicable regulations such as the UK Modern Slavery Act 2015, the Australia Modern Slavery Act, 2018 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.

Tata Code of Conduct

We are governed by the [Tata Code of Conduct](#) ('the Code') which represents the values and core principles that guide the conduct of every Tata business. The Code makes it clear that as an organization, 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 anyone else in order to secure employment with us, or to work with us.

With respect to 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.

1. Preventing slavery and human-trafficking 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 it.
- 1.2 TCS 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, including in relation to working hours, rest breaks and holidays.
- 1.3 TCS has been a signatory of the UN Global Compact 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. Our policies are endorsed by senior management and specify expectations from associates, suppliers and business partners.

- 1.4 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.
- 1.5 TCS makes appropriate checks in line with applicable laws on all employees, business associates, recruitment agencies, directors, officers, consultants, volunteers, suppliers or service providers, to identify compliance risks.
- 1.6 We seek relationships with suppliers who share a common commitment to ethical and lawful behavior. 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. 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.

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, canteen services, security services, transportation, infrastructure etc.) and people (e.g. contractors, business associates etc.). TCS suppliers of Information Communication Technology and Telecommunications equipment are encouraged to be members of the Responsible Business Alliance, formerly the Electronics Industry citizenship coalition, wherever applicable.
- 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 also through the TCS website.
- 2.3 When supplying goods or services, our suppliers must assess their business and supply chains and confirm 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.
- 2.4 If they do not comply with the Supplier Code of Conduct, or are found to have slavery or human-trafficking 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.
- 2.5 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 familiarize themselves of the same. This 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 of 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 organization. Related compulsory training is administered as part of the employee induction process. Training on geography specific Labour Laws are provided to the associates, as required. Associates are encouraged to continuously review and familiarise themselves with the company policies on conduct, ethics and whistleblowing.
- 3.3 They must immediately report any suspicions of Modern Slavery or human-trafficking in our business or supply chains through the Ethics Concern reporting portal or to 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 which 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 UK

Keeping in view 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 Number FC025271 UK branch registration number BR007627 | Not applicable | Y |
| W12 Studios Limited | Tata Consultancy Services Limited | 08055387 | 100% | Y |
| Diligenta Limited | Tata Consultancy Services Limited | 5535029 | 100% | N (Refer to Diligenta website for Diligenta's Statement) |

Representatives of the entities in UK have been involved in the preparation of this Statement on Modern Slavery.

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

- Supplier contracts includes a clause on supplier's responsibility towards prevention of modern slavery as per the Act.
- Existing older contracts have been amended by adding an Addendum related to Modern Slavery.

5. Applicability in Australia

Keeping in view the Australia Modern Slavery Act, 2018, this Statement is applicable to our entities in Australia 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 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 Holdings Pty Limited (Liquidated w.e.f. January 29, 2020) | TCS FNS Pty Limited | ABN 61 003 653 549 | 100% | Y |
| TCS Financial Solutions Australia Pty Limited | TCS FNS Pty Limited | ABN 20 001 899 369 | 100% | Y |

Representatives of subsidiaries in Australia have been involved in the preparation of this Statement on Modern Slavery.

Specific additional actions taken in the Australia entities over and above global actions include the following:

- Supplier contracts are being amended to include a clause on supplier's responsibility towards prevention of modern slavery as per the Act.

6. Effectiveness of actions and residual risk

TCS is in the knowledge-based industry and its activities involve low risk of Modern Slavery. Our Code of Conduct, Policies and Procedures further addresses the risk of Modern Slavery. As regards our supply chain, our engagement process with them and the Codes governing their appointment ensure that the risk of Modern Slavery is 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

This statement was approved by the Board of Tata Consultancy Services Ltd on July 09, 2020.

For and on behalf of Tata Consultancy Services Ltd worldwide and all of its wholly owned subsidiaries



N.G. Subramaniam
COO & Executive Director