Tata Consultancy Services Limited and associated Subsidiary Companies

Modern Slavery Act Statement
Applicability

This Statement on Modern Slavery is applicable to Tata Consultancy Services Limited and its associated 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 2018-19 fiscal year that ended on the 31st of March 2019, 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 regular compliance committees provide assurance on TCS’ compliance.

2. TCS 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 for services 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 their 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. **Effectiveness of actions**

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

**Authorised for and on behalf of Tata Consultancy Services Ltd worldwide and all of its wholly owned subsidiaries**

*N.G. Subramaniam*

*COO & Executive Director*