

# **Tata Consultancy Services Limited and its Subsidiary Companies**

## **Statement on Prevention of Modern Slavery**

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### *Applicability*

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

### *Introduction*

TCS is an IT services, consulting and business solutions organization that has been partnering with many of the world's largest businesses in their transformational journeys for over fifty 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™ global delivery model.

Modern Slavery is a term 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, etc.

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.

This statement sets out the steps that we, Tata Consultancy Services, have undertaken during the 2021-22 fiscal year that ended on the 31st of March 2022, to identify potential threats of modern slavery and to the best of our ability prevent the existence of modern slavery within our own operations and within local and global supply chains. With numerous suppliers across geographies, TCS takes a risk based approach to the same. 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. 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 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), 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.

## 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.). TCS' suppliers of Information Communication Technology and Telecommunications equipment are encouraged to be members of the Responsible Business Alliance 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 is provided to the associates, as required. Associates are encouraged to review and continuously familiarize 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](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 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 the UK

Representatives of the entities in UK have been involved in the preparation of this Statement on Prevention of Modern Slavery. 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 2021-22](#).

Specific additional actions taken in the UK entities in 2021-22 over and above global actions include the following:

- The Anti-Slavery Working Group consisting of representatives from the Employee Relations and Corporate Sustainability teams, has been focusing on reviewing policies and practices towards prevention of human exploitation, trafficking or modern slavery within TCS UK and Ireland and its supply chain. Towards this, it has been working on benchmarking our practices with those of other leading companies in the industry to review and further improve our initiatives in this area.
- Modern Slavery is included as part of new joiner’s induction program. The training aims at raising awareness among employees on modern day slavery signs and reporting processes.
- Supplier Contracts include a clause on supplier’s responsibility towards prevention of modern slavery in compliance with the Act. Risk assessments are undertaken for all suppliers of products and services procured by TCS.
- Our supplier risk assessment process categorises and identifies suppliers for additional assurance evaluations based on a final residual risk ranking. Our priority suppliers who have been identified based on a residual risk ranking categorization, are required to undertake our supplier evaluation that assesses their health, safety, social and environmental standards. TCS reserves the right to undertake supplier audits.

We remain committed to improving our efforts to address modern slavery risks in our business and supply chains. We plan to design additional trainings for identified select groups such as managers and staff dealing with supply chain.

### 5 Applicability in Australia

Representatives of the entities in Australia have been involved in the preparation of this Statement on Prevention of Modern Slavery. This Statement is applicable to our entities in Australia 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 2021-22](#).

TCS in Australia is committed to comply with the provisions of the Australia Modern Slavery Act, 2018. TCS entities in Australia have taken significant additional steps over and above global actions in 2021-22 to identify the areas of risk of modern slavery within its operations and within its supply chains.

- The Modern Slavery Committee for Australia consisting of representatives of various units and departments continue to focus on this matter. The Committee convened meetings twice in 2021-22 to review progress and discuss review of Modern Slavery Statements of suppliers, following due diligence and compliance to obligations.
- The Modern Slavery Supplier Self-Assessment Questionnaire (SAQ) is being sent to supply chain members. Further actions are taken based on the analysis of responses received. Most suppliers in TCS Australia supply chain have long existing business relationship with TCS, and no existing data or information at hand has revealed any obvious risks of modern slavery. Where required, discussions would be held with supply chain members for raising awareness and possible advice in implementing appropriate measures to ensure no incidents of modern slavery are present in their supply chains.
- Supplier contracts include a clause on supplier's responsibility towards prevention of modern slavery in compliance with the Act. Modern Slavery awareness and prevention is encouraged in all discussions concerning the engagement of new suppliers and in the management of existing suppliers.
- A web – based training pack on the Modern Slavery Act has been designed and implemented to increase awareness among all employees across TCS Australia. The induction process for all new employees includes online training to create awareness of modern slavery and how TCS complies with the Modern Slavery Act. Discussions are held with functional teams to create awareness on modern slavery.

**Audit of TCS Australia operations:**

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

The activities for 2022-23 will continue to build on the activities being undertaken. It is proposed to have more focus on governance, training and awareness building within the organization for associates in other jurisdictions engaged in providing services to clients in Australia, and in the supply chain with workshops on modern slavery risk assessment, due diligence, and remediation, and further build the commitment of Tier 1 suppliers to ensure compliance with Modern Slavery law amongst their supply chain.

This Statement is also being submitted to the prescribed Authority in Australia.

**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 to 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 authorised on 15 September 2022.*

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

***N.G. Subramaniam***

***COO & Executive Director***