

TATA TECHNOLOGIES ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

YEAR ENDING – MARCH 31, 2023

Applicability:

This Statement on Modern Slavery is applicable to Tata Technologies Europe Limited, its subsidiaries and group companies (henceforth referred to as Tata Technologies).

Introduction:

Tata Technologies Europe Limited (Tata Technologies) is committed to protecting human rights and prohibiting all acts of human trafficking, slavery, servitude, forced or compulsory labour, debt bondage, deceptive recruiting for labour or services and child labour, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain throughout the organization, its business and supply chain.

Pursuant to the UK Modern Slavery Act 2015, Tata Technologies herein elucidates its initiatives to mitigate/eradicate modern slavery and human trafficking from its business and supply chain. This Statement sets out the steps that Tata Technologies as an organization has taken to ensure that no form of slavery and human trafficking exists in its business or supply chain.

This statement is issued for the financial year ended March 31, 2023 (as approved by the Board of Directors on May 16, 2023) and covers the activities of Tata Technologies.

Who We are:

Tata Technologies is a company which provides engineering and design, PLM (product lifecycle management), and enterprise solutions services to the automotive, heavy industrial machinery and aerospace industries. Our workforce primarily consists of skilled and qualified personnel who are directly employed and are not in any category which is generally recognized as vulnerable to modern slavery, so our focus is to ensure there are policies and procedures in place for our contractors and suppliers.

Our principles and values

Modern slavery is an unlawful act which restrains personal liberty and exploits individuals for personal or commercial gain. Our understanding of modern slavery is based on the definitions and principles set out in the Modern Slavery Act, 2015 and associated guidance. Tata Technologies has a zero-tolerance approach towards modern slavery which it considers as a categorical and indefensible violation of every individual's basic human right. Tata Technologies acknowledges its responsibilities under the Modern Slavery Act 2015 and seeks to ensure transparency within the organization and its supply chain.

As part of our culture of good governance, Tata Technologies operates on a set of core values or principles enumerated in our **Tata Code of Conduct (TCoC)** which reflects our relationship with our stakeholders and includes the standards of ethical behaviour that we expect from our suppliers. We are proud of our ethical principles as articulated in the TCoC, to which all Tata Group companies subscribe. The TCoC requires Tata companies and employees to act with professionalism, honesty and integrity, and to preserve human rights of every individual and the community.

Tata Technologies governance framework flows from a set of policies, intended to promote ethical and legally compliant business conduct, which set the principles and behaviours to which we and our employees are required to adhere.

Our Supplier Code of Conduct also embodies principles against slavery and servitude. Suppliers are required to comply with the Supplier Code of Conduct as part of our supplier engagement process and are issued with contracts referencing Tata Technologies' sourcing standards and the requirements we expect them to meet on modern slavery. "Supplier" here means any business, company, corporation, person or other entity that provides, sells or seeks to sell, any kind of goods or services to Tata Technologies, including the Supplier's employees, agents and other representatives. Supplier Code of Conduct specifically requires suppliers to ensure that their employees are hired on their own free will and that they must prohibit forced, bonded, or any other form of compulsory labour such as slavery or trafficking, transporting, harbouring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services in all of their operations. At the time of recruitment, the Suppliers must provide a written employment agreement containing terms and conditions of employment to all their employees.

Suppliers and their agents must not confiscate any identity or immigration documents, such as government issued identification cards, passports or work permits, unless required by law. If suppliers 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, Tata Technologies retains the right to terminate the contract for services with immediate effect and pursue legal remedies against the supplier concerned.

Risk Assessment & Due Diligence:

As part of our commitment to identifying and eliminating any modern slavery at Tata Technologies, we take a risk-based approach to understanding and monitoring our Supply Chain, which is an ongoing area of focus for 2023. Our approach is guided by best practice guidance in our procurement function, supply chain monitoring, as well as through ongoing conversations with our Anti-Modern Slavery subject matter experts, to assess any change to Modern Slavery risks in our business and/or supply chain and provide relevant actions to mitigate arising risks.

We make efforts to build long-standing relationships with local suppliers and contractors to effectively enforce its ethical business standards.

Effectiveness and Reporting:

Tata Technologies has in place a whistleblower policy published on company's official website, which details the whistleblowing process and a formal grievance redressal framework that enables everyone, including partners, contractors and employees, to raise their concerns at a single platform with complete confidentiality and has strict 'non-retaliation' policy to safeguard the interests of whistleblowers. We aim to encourage openness and transparency by actively supporting employee and supplier engagement and with the ability to raise concerns which can be reported through hotline numbers mentioned in the policy and through https://secure.ethicspoint.eu/domain/en/report_company.asp?clientid=108989.

Raising Awareness:

Tata Technologies uses a variety of means to raise employee's awareness of its policies and ethical standards. This includes e-learning and face-to-face training, internal communications and awareness sessions. Induction processes are in place to ensure that new staff are introduced to key policies and expectations, including the Tata Code of Conduct. Tata Technologies has implemented a mandatory training programme for all its employees to raise further awareness of modern slavery and human

trafficking. Our zero-tolerance approach to modern slavery will be communicated to all our suppliers at the very outset of our business relationship with them.

Tata Technologies suppliers are also required to assess their businesses and supply chain to ensure compliance with the provisions of the Modern Slavery Act, anti-human trafficking and other human rights requirements as incorporated under this Statement.

Impact of COVID-19 on Tata Technologies operations and supply chain:

Tata Technologies recognizes that the COVID -19 pandemic would result in some workers becoming more vulnerable to modern slavery. Tata Technologies has taken multiple steps to protect vulnerable workers in their global operations and supply chains from the impacts of COVID-19. As a response to COVID-19, Tata Technologies activated its strong Business Continuity Plan framework that enabled it to respond to the COVID-19 crisis with agility. Our workforce is enabled to work from home and we continue to service our customers. Limited employees are working from campus and strong control measures have been put in place to ensure employee health and safety. Proper sanitization, availability of medical staff within the premises, appropriate social distancing has been implemented and is given utmost priority. Even during the pandemic, we have seamlessly reached out to our suppliers reiterating our commitment to upholding of Human Rights and have sought confirmation from them on their continued compliance with our code of conduct policies.

Next Steps:

Modern Slavery is a complex challenge which requires ongoing, evolving and continually improving efforts. Over the course of the next financial year Tata Technologies will continue to review its internal processes to ensure that its obligations under the Modern Slavery legislations are met. This statement was approved by the Board of Directors May 16, 2023.

Signed on by:



Warren Harris

(Director)