

Business and Human Rights Policy Document

Tata Communications Limited and its direct and in-direct wholly owned subsidiaries (collectively, the “Company” or “Tata Communications”) re-affirms its commitment to adhere to and uphold the principles of Business and Human Rights. We commit to respect and protect human rights and remediate adverse human rights impacts resulting from or caused by our businesses.

In this spirit, the Company presents its Business and Human Rights Policy (the “Policy”), which shows its commitment to operating its businesses while conforming to the highest moral and ethical standards. The Policy applies and is relevant to all its rightsholder’s (employees, contract workforce, communities, consumers / customers, value chain partners, etc.) as relevant and as identified by the Company.

Our Commitment

Respect for human rights is a fundamental value of the Tata Group. For more than 150 years, the Company has built a reputation on trust and respect, and we are committed to earning that trust with a set of values that represent the highest ethical standards. As a value driven organisation, our stellar reputation and success as a business entity has been defined by the powerful commitment and adherence to the core values and principles enshrined in the Tata Code of Conduct, by all our employees, directors and value chain partners. The five core values that underpin the way we conduct our business activities are: Integrity, Responsibility, Excellence, Pioneering and Unity.

The Company also seeks to honour the core principles of internationally recognised human rights frameworks and guidelines, along with the expectations outlined under the Tata Group Business and Human Rights Guidelines and the Tata Code of Conduct. In doing so, we aim to ensure that we are not-either directly or indirectly-in violation of any business and human rights.

Policy Alignment

The Human Rights Policy is in consonance with the following:

- The United Nations Universal Declaration of Human Rights
- The ILO Declaration on Fundamental Principles and Rights at Work
- The Modern Slavery Act 2015
- The Tata Code of Conduct
- The Tata Affirmative Action Policy (TAAP)
- The Tata Group Business and Human Rights Guidelines

In addition to the above, the Policy also aligns with our vision of a connected society, which is an extension of the UN Sustainable Development Goals 2030.

Business Operations & Human Rights

The Company is dedicated to ensuring that the fundamental rights of people including our extended value chain stakeholders like customers, NGO partners, suppliers and contract workforce, etc. involved in our operations throughout the value chain are respected. Our objective is to maximize economic opportunities, while being cognizant of the expectations of value chain stakeholders pertinent to our line of business, from a human rights and value creation perspective.

As a company, we shall strive to recognize individuals and communities as holders of human rights and shall:

- Constitute a governance structure to oversee human rights commitments.
- Integrate an approach that respects and protects human rights in business strategy and risk frameworks.
- Foster an understanding of human rights across all rightsholders of the business.

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- Advocate protection of human rights from adverse impacts resulting from or caused by our business.
- Set up a fair, transparent and consultative remediation framework to address human rights risks.
- Disclose progress on human rights performance in line with national and/or global reporting frameworks.

Business Human Rights Salient Features

The document contains key human rights elements with which we adhere. These have been prioritized and detailed, based upon a salience assessment exercise conducted within the Company. The Policy seeks to establish the minimum requirements that all the rightsholder (employees, contract workforce, communities, consumers / customers, value chain partners, etc.) must comply with from a business human rights perspective in adherence with the [Tata Code of Conduct](#).

Acceptable Usage: Through the [Acceptable Use Policy \(“AUP”\)](#), the Company seeks to encourage responsible use of its networks, systems, services, web sites and products, and to enable the Company to provide users with secure, reliable, and productive services.

Anti-bribery and Anti-corruption: Our employees and those representing us, including agents and intermediaries, shall not, directly, or indirectly, offer or receive any illegal or improper payments or comparable benefits that are intended or perceived to obtain undue favours as a pretext for conducting our business operations in accordance with the [Anti-Corruption Policy](#).

Community: We believe it’s our responsibility to use our scale and expertise to make positive changes in line with UN Sustainable Development Goals, in the areas which we operate. As stated in our [CSR Policy](#), we will work towards creating connected societies to advance the well-being of people and planet. Further as defined under [Tata Affirmative Action Policy**](#) we shall work towards addressing structural and social inequities by providing equal opportunities and inclusive growth to historically marginalised groups.

Dignity and Respect: We affirm that all persons in our work environment and our value chain are entitled to be treated with dignity and respect. We are committed to eliminating all forms of bullying, discrimination, harassment, and retaliation in the workplace through the implementation of clear and fair disciplinary procedures and processes as prescribed under applicable laws in accordance with our [Global Dignity at the Workplace Policy**](#).

Equal Opportunity: We provide equal opportunities to all our employees, and to all eligible applicants for employment in our Company as defined under [Global Dignity at the Workplace Policy**](#). We do not discriminate on any grounds protected by applicable laws, during any phase or aspect of employment, including but not limited to recruitment, hiring and firing, transfer, promotion, or other terms and conditions of employment. Additionally, we shall have fair and transparent employee policies which promote diversity, equality and inclusion in accordance with applicable laws.

Fair Competition: As defined under the [Tata Code of Conduct](#), we support the development and operation of competitive open markets and the liberalization of trade and investment in each country and market in which we operate. We affirm our commitment to not support or enter into any activity constituting unlawful anti-competitive behaviour.

Fair Wages: As defined under the [Tata Code of Conduct](#), we support the disbursement of fair wages among our employees, on the sole basis of performance, merit, competence, and potential. We also encourage our suppliers and partners to pay at least the minimum wage and provide any benefits required by law and/or contract to their workers. We further encourage our suppliers and partners to adhere to responsible business conduct by complying with local labour laws, rules and regulations pertaining to payment of wages and other applicable statutory benefits.

Freedom of Association and Collective Bargaining: As defined under the [Tata Code of Conduct](#), we recognise that employees may be interested in joining associations or involving themselves in civic or public affairs in their personal capacities, provided such activities do not create an actual or potential conflict with the interests of our Company. Our employees must notify and seek prior approval for any such activity in accordance with applicable company policies and laws.

Freedom of Expression and Information: As defined under the [Tata Code of Conduct](#), we recognise and protect the right to freedom of expression of our employees, suppliers and users. We encourage the reporting of concerns or any questionable matters relating to our business operations, including the breach of human rights. We also protect our users’ privacy and

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freedom of expression and commit to stringently implementing and monitoring our [Network Shutdown Policy](#) to protect human rights in accordance with applicable laws. Employees may join associations or involve themselves in civic or public affairs provided such activities do not create conflict with the interests of the Company.

Occupational Health and Safety: We recognise the importance of ensuring occupational health and safety and overall well-being of all our employees, contract workforce and other interested rightsholders who may be impacted by our operations, product, and services. As defined under the Company's [Occupational Health and Safety Policy](#), we shall strive to provide a safe, healthy, and clean working environment for our employees, and all those who work with us.

Products and Services: As defined under the Company's [Occupational Health and Safety Policy](#), we shall strive to provide a safe & healthy work environment for our employees, business partners and those who may be impacted by our operations. We are committed to supplying products and services of world-class quality that meet all applicable standards, in compliance with applicable laws. In alignment with the Company's [Network Shutdown Policy](#), we shall promote and adhere to the principles of internationally recognized human rights, while complying with local business-related laws and regulations. We shall also market our products and services on their own merits and not make unfair or misleading statements about the products and services of our competitors.

Right to Privacy, Integrity of Information and Assets: We respect the privacy of our users' and are committed to implementing appropriate protection measures for safety of user data as defined under the Company's [Privacy Policy](#). We seek to comply with all applicable legislation regarding the protection, security and confidentiality of personal data. Our employees shall not make any wilful omissions or material misrepresentations that would compromise the integrity of our records, internal or external communications and reports. Furthermore, our employees shall respect and protect all confidential information and intellectual property of our Company, including all third-party intellectual property and data.

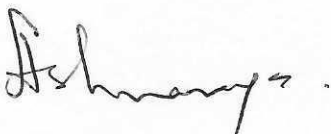
Trafficking, Modern Slavery and Child Labour: The Company has a zero-tolerance approach to modern day slavery. As defined under the Company's [Supplier Code of Conduct](#) and [Sustainable Supply Chain Policy](#), we are committed to ensuring that modern slavery and human tracking do not occur in our workplace or within our supply chain. We do not employ children at our workplaces, and we do not use forced labour in any form. Without limiting the foregoing, we specifically adhere to The Child and Adolescent Labour (Prohibition and Regulation) Act of 1986, India which prohibits the engagement of children in all occupations.

Reporting and Redressal Mechanism

The Company does not tolerate any malpractice, impropriety, statutory non-compliance, or wrongdoing with reference to Human Rights and its salient elements. To that end, in addition to the relevant policies identified above, the Company has adopted an exhaustive grievance redressal and remedial framework consisting of its [Whistle-blower policy](#).

The Policy provides and addresses concerns or complaints regarding any reportable matters defined in the Policy, including but not limited to infringement of human rights including privacy rights and freedom of expression, disclosure matters, anti-corruption, or any other company matters involving fraud, employee misconduct, illegality or health and safety and environmental issues which cannot be resolved through normal management channels. The [Whistle-blower policy](#) intends to encourage and enable Personnel and any person other than Personnel to pro-actively raise concerns regarding any such instances without fear of reprisal, discrimination or adverse employment consequences. They may do this through the Company's "[Ethics Helpline](#)", managed by an independent third party which enables a Whistle-blower to report a potential wrongdoing through various channels such as phone, email, web portal, fax and PO Box.

For any feedback, queries or grievances related to our sustainability practices, please write via the "[Get in touch with us](#)" page.



Amur S Lakshminarayanan

MD & CEO

1st Feb 2023

For more information, visit us at www.tatacommunications.com

Annexure (References)

1. [Acceptable Usage Policy](#)
2. [Anti-Corruption Policy](#)
3. [Anti-Human Trafficking and Modern-day Slavery Statement](#)
4. [Corporate Social Responsibility Policy](#)
5. [Global Dignity in the Workplace Policy**](#)
6. [Network Shutdown Policy](#)
7. [Occupational Health and Safety Policy](#)
8. [Prevention of Sexual Harassment at Workplace Policy**](#)
9. [Privacy Policy](#)
10. [Supplier Code of Conduct](#)
11. [Sustainable Supply Chain Policy](#)
12. [Sustainability Strategy](#)
13. [Tata Code of Conduct](#)
14. [Tata Affirmative Action Policy**](#)
15. [The Modern Slavery Act 2015](#)
16. [The United Nations Universal Declaration of Human Rights](#)
17. [The UN Sustainable Development Goals 2030](#)
18. [The ILO Declaration on Fundamental Principles and Rights at Work](#)
19. [The Tata Group Business and Human Rights Guidelines**](#)
20. [Whistle-blower Policy](#)

*To learn more about the policies that govern the use of our network, agreements, handling of information, and more, we please click [here](#).

**Internal Policies