


Tata Steel Responsible Supply Chain Policy

Tata Steel's vision is to be the global steel industry benchmark in Value Creation and Corporate Citizenship. Sustainable and responsible business practices are key enablers to achieving this vision and we are committed to adopting them across our value chain. We encourage our Supply Chain Partners to share the same commitment and expect them to integrate the following Sustainability Principles in all their decisions and processes.

- **Fair Business Practices** – Supply Chain Partners shall comply with all applicable laws, demonstrate integrity and transparency. They shall not engage in any of the following actions: fraud, bribery, insider trading, anti-competitive conduct, third-party representation, and money laundering. In addition, Supply Chain Partners shall have policies and procedures (such as training) in place designed to prevent such actions.
- **Health & Safety** – Supply Chain Partners shall provide a safe and healthy work environment, implement measures to prevent illness, injuries, and accidents, and ensure that the emergency preparedness and response protocols are in place for their workers.
- **Human Rights** – Supply Chain Partners shall respect and uphold human rights of their key rightsholders and actively remediate any adverse impacts of their business on important human rights issues such as Discrimination, Child and Forced Labor, Freedom of Association and Collective Bargaining, etc.
- **Environmental Protection** – Supply Chain Partners shall adopt and maintain effective management practices to reduce their greenhouse gas (GHG) emissions, freshwater withdrawals, and plastic consumption. They shall also abide by all applicable environmental laws of the land.
- **Local Community Development** – We expect our Supply Chain Partners to contribute to the social, economic, and institutional development of the communities in which they operate.

We seek collaboration from all our Supply Chain Partners to work with us in promoting responsible business practices for achieving a sustainable steel value chain and a better planet.

This policy will be read with the Guidelines for Tata Steel Responsible Supply Chain Policy. It will also serve as a Business Associate Code of Conduct for Tata Steel's Supply Chain Partners.



TV Narendran
CEO & Managing Director

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Guidelines for Tata Steel Responsible Supply Chain Policy

Introduction

Tata Steel (the “Company”) commits to its core values and principles through its adoption of Tata Code of Conduct (TCOC). The Company believes that its value chain partners are an integral part of its ecosystem and expects them to uphold these core values and principles in their business interactions with the Company. The Company has adopted the Tata Steel Responsible Supply Chain Policy (the “Policy”) and expects Supply Chain Partners to abide by the Policy.

These Guidelines for Tata Steel Responsible Supply Chain Policy will complement the Policy and help Supply Chain Partners in adopting the principles described in the Policy. It communicates how the Company will work with our Supply Chain Partners and sets out our expectations and minimum standards for fair business practices, health and safety, human rights, and environmental performance and local community development.

Adherence to these aspects will be given due consideration during evaluation and contract approvals both for new as well as existing supply chain partners, in a phased manner. We expect Supply Chain Partners to improve continuously with respect to the Policy requirements by:

- Integrating them across all business decisions.
- Putting in place management systems to enable continuous improvement.
- Extending these principles to their own supply chain.
- Aligning themselves to global/industry standards.

Tata Steel strives to source key input materials (“raw materials”) from suppliers whose policies and practices are aligned with the ResponsibleSteel™ standard, the steel industry’s first global multi-stakeholder standard and certification initiative as regards to responsible business practices. We encourage our raw material suppliers to adapt [ResponsibleSteel™](#) and [BES6001](#) recognized input material programs as applicable. The Company’s Jamshedpur steel plant was the first to receive ResponsibleSteel™ certification in India.

Definition of Supply Chain Partners and Scope of the Policy

Supply Chain Partners (hereby referred to as “Partners”) refer to all the business associates of Tata Steel in its supply chain with whom we interact directly or indirectly for business or transactional dealings. They include:

- Suppliers /Vendors
- Distributors
- Steel Processing Centers (SPCs)
- Franchisees

- Downstream processing agencies

The Policy will be applicable to all the above Partners across locations globally, and we expect them to extend it to their own supply chains as well. This Policy will be periodically reviewed to keep it current and updated.

Our Commitment to Supply Chain Partners

We expect all our Partners to commit to meeting the requirements stated in the Policy. However, we are also cognizant of the fact that all our Partners may not be able to meet all the requirements from day one, but we expect a commitment from all our partners for meeting the requirements within a reasonable period. We also assure working with our Partners in identifying action plans towards achieving improved conditions in a timely manner and giving access to examples of best practices from elsewhere in our supply chain.

Methodology

All Supply Chain Partners are required to make a self-declaration to the Responsible Supply chain Policy every year This ensures a continuous commitment from them to adhere to the requirements stated in the policy.

The Company recognizes that there are differences in terms of scale, scope, location, and operations of our partners. The implementation of the Policy for the Partners who are deemed 'critical' will accordingly be dependent on their "criticality to business".

The respective functions (Procurement, Supply Chain, Sustainability and Marketing & Sales) will be responsible for overall administration of Policy and for developing oversight mechanism in their respective functions. Each function will identify their "critical supply chain partners" based on criterion defined by them.

- The critical supply chain partners will be informed by respective functions for further engagement on Policy.
- The critical partners may undergo an assessment/audit for ensuring compliance. Based on outcome of the assessment/audit, a joint action plan will be developed.

Tata Steel is committed to facilitate its supply chain partners in implementing the jointly identified Corrective Action Plans (CAP).

Tata Steel's expectations from Supply Chain Partners

We are looking for a long-term commitment from our partners in ensuring a responsible supply chain for Tata Steel in meeting the greater objective of a sustainable planet. Our expectations from our supply chain partners are:

- All partners must demonstrate compliance to all the five principles in the policy over a period. They are expected to have written policies/guidelines covering important issues elucidated in the Policy.

- It is expected that our partners are transparent, and, to the extent permitted by applicable law, share best practices and collaborate with Tata Steel and its other partners to further improve responsible business practices.
- Compliance of the Policy by Critical Partners will be assessed through periodic questionnaire-based audits, accompanied by site visits if deemed necessary.
- From all our Supply Chain Partners, we will take a written declaration of compliance against the Policy requirements.
- As a last resort, we may consider disengaging with partners that do not meet the requirements of the Policy repeatedly.
- New Supply Chain Partners: All new partners will be required to sign up to the Policy as part of the qualification process.
- Existing Supply Chain Partners: Existing partners will be required to self-assess their performance against the Policy and furnish a Corrective Action Plan (CAP) on identified areas of improvements. New contracts or renewal of existing contracts will incorporate the principles of the Policy.

Detailed Guidelines for the Principles

Tata Steel expects its Supply Chain Partners to comply with the provisions of our Responsible Supply Chain Policy. We expect our partners to have a similar policy for their entire supply chain. We are committed to work with our partners to implement the Policy for promoting supply chain transparency and establish long-term sustainable relationships. This document sets out our expectations and gives guidance for implementation to our immediate supply chain partners in line with the following sustainability principles:

Principle 1 – Fair Business Practices

1.1. Compliance with laws and regulations

- 1.1.1. The Supply Chain Partners shall always maintain the highest standards of ethical conduct and are expected to comply with all the applicable local, national, and multi-jurisdictional laws and regulations (broadly and collectively, the “**Laws**”) related to the conduct of their businesses.
- 1.1.2. In case the standards mentioned in the Responsible Partner Code differ from any legal requirements provided by such Laws, the stricter of the standards prescribed in the Responsible Partner Code or the Laws shall apply.

1.2. Integrity and transparency

- 1.2.1. The Supply Chain Partners shall uphold integrity and transparency while doing business with the Company.
- 1.2.2. All products and services delivered must meet the timelines, quality, specifications, terms agreed and comply with applicable Laws concerning importing, exporting,

reexporting or transfer or packaging or labelling or sales or after sales of products and services.

- 1.2.3. Supply Chain Partners shall accurately record and maintain information regarding its operations, financial transactions, labour, health, and safety in relation to any business transaction with the Company and shall disclose such information to the Company or entities as and when reasonably requested by the Company and/or as required by the Laws.
- 1.2.4. Supply Chain Partners who undertake marketing or promotional activities for, on behalf of, or with the Company shall do so without making unfair or misleading statements and in compliance with the Laws.
- 1.2.5. Supply Chain Partners shall responsibly source their raw materials/products/services by implementing appropriate mechanism for due diligence of its own supply chains and have appropriate mechanisms in place to ensure supply chain traceability to support Company's effort to mitigate ethical and/or sustainability risks. Partners shall provide Company within a reasonable time any information reasonably requested by Company to facilitate any investigation by the Company on the same.

1.3. Anti-bribery, Anti-fraud, and anti-corruption

- 1.3.1. Supply Chain Partners shall not engage in any form of fraud, bribery or corruption, including offering, promising, giving, or receiving anything of value to obtain or retain business or gain an unfair advantage. Supply Chain Partner shall comply with Laws for fraud, anti-bribery and anti-corruption.
- 1.3.2. Supply Chain Partners shall establish systems and processes to monitor and report on their compliance with applicable Laws related to fraud, anti-bribery, and anti-corruption, and promptly address and report any non-compliance as required under relevant Laws. Supply Chain Partner shall conduct due diligence on their Supply Chain Partners to ensure that they comply with fraud, anti-bribery and anti-corruption regulations.

1.4. Anti-money laundering

- 1.4.1. Supply Chain Partners shall not engage in any activities that facilitate money laundering and/or engaging in transactions with individuals, groups or entities known to be involved in money laundering or terrorism or criminal activities.

1.5. Sanctions and trade controls

- 1.5.1. Supply Chain Partners shall comply with applicable sanctions and trade restrictions imposed by the governments in the countries in which they operate. This would include and relate to restrictions on trade with embargoed countries, entities, or individuals, as well as restrictions on the use or transfer of certain technologies or products.

1.6. Competition and anti-trust

- 1.6.1. Supply Chain Partners shall comply with applicable anti-trust Laws in the countries in which they operate. This includes but not limited to the Laws related to abuse of a dominant position, anti-competitive information exchange, price-fixing, market allocation, or any other kind of anti-competitive behavior.
- 1.6.2. Supply Chain Partners shall compete fairly and honestly in the market. They shall not engage in any activities that could be considered anti-competitive including but not limited to predatory pricing, bid rigging, cartelization, or restrictive trade practices etc.

1.7. Gifts and hospitality

- 1.7.1. Supply Chain Partners shall not offer or give gifts, hospitality, or other favors to employees, officers, directors, or anyone related to the Company that could influence or appear to influence business decisions or create a conflict of interest.
- 1.7.2. Any gift or hospitality offered to employee(s), officers, or directors of the Company shall adhere to the Gift and Hospitality Policy of the Company.
- 1.7.3. Supply Chain Partners shall never offer, directly or indirectly, any form of gift, entertainment, or anything of value on behalf of the Company to anyone including but not limited to government officials or customers, or their representatives to obtain or retain business; influence business decisions; and/or secure an unfair advantage.

1.8. Conflict of interest

- 1.8.1. The company expects that the transactions with Supply Chain Partners shall be objective, fair and avoid even the appearance of a conflict of interest.
- 1.8.2. A conflict of interest exists when personal or financial relationships or activities impair, or even appear to impair the ability to make objective and fair decisions. This includes but is not limited to Supply Chain Partner's Key Management Personnel's immediate family (including parents, siblings, spouse, partners, and children), relatives or a close personal relationship employed with the Company. The Supply Chain Partner is therefore required to give full disclosure of its personal or financial relationship with any employee of the Company, which could lead to an actual or potential conflict of interest.
- 1.8.3. Supply Chain Partners shall avoid engaging in any activity that would create an actual or apparent conflict of interest that would impact their business transaction with the Company. In the event an actual or potential conflict of interest does arise, Supply Chain Partner shall immediately report it to the Company.

1.9. Insider trading

- 1.9.1. Supply Chain Partners and their personnel shall not use any confidential information or non-publicly disclosed information, or unpublished price sensitive information

obtained during their business relationship with the Company as the basis for trading or for enabling others to trade in the stock or securities of the Company. Such information shall include but not be limited to information about the Company's financial information, new product development/launches, investment decisions and acquisition/divestiture of businesses.

1.10. Information security and data privacy

1.10.1. Supply Chain Partners shall comply with all applicable Laws relating to information security and data privacy and ensure that their own Supply Chain Partners also comply with such Laws. Supply Chain Partners shall:

1.10.1.1. only collect, process, and use data (including personal data) for the purposes specified in their contract with the Company and comply with applicable Laws for data collection and processing.

1.10.1.2. take adequate measures to protect any data (including personal data) that they may have access to, including customer data, financial data, and intellectual property.

1.10.1.3. implement appropriate access controls and other process controls to prevent unauthorized access to data and systems. This may include adherence to key applicable international information security standards and frameworks such as ISO 27001 and NIS / NIS2.

1.10.1.4. have a plan in place to respond to data breaches or other security incidents and shall notify the Company promptly in the event of such an incident within the time frame prescribed under applicable Laws or in accordance with any data processing agreements signed with Company. If no such time frame has been prescribed as between Partner and Company, then Partner shall notify Company within 24 hours of having knowledge of the breach, and provide all the necessary information and assistance to investigate and mitigate the breach.

1.10.1.5. adhere to the Company data retention and destruction policies. They shall not retain data longer than necessary for the purposes specified in their contract and as per Laws and shall securely return or dispose of data when it is no longer needed.

1.11. Intellectual property and Company assets

1.11.1. Supply Chain Partners shall not use any intellectual property including trademarks, logos, patents, copyrights, trade secrets and other Company's assets physical or digital or intangible without obtaining proper licenses or permissions from the Company.

1.11.2. Supply Chain Partners are expected to take necessary measures to protect the Company's physical, digital and intangible assets including but not limited to confidential and proprietary information, trade secrets, intellectual property.

1.12. Publicity and brand name usage

1.12.1. Supply Chain Partners shall not issue any statements or promotional contents to the press or social media or any other media service relating to the Company or its affiliates, or their operations and/or business and/or activities with the Company without explicit prior written permission from the Company.

1.13. Armed Groups and Conflict Minerals

1.13.1. Armed groups - we will not tolerate any direct or indirect support via our suppliers to non-state armed groups through the extraction, transport, trade, handling, or export of minerals. Armed groups as defined by United Nations Security Council resolutions.

1.13.2. Tata Steel takes a strong stance against the use of conflict minerals (3TG's) tin, tungsten, tantalum, and gold from mines that finance armed conflicts. Tata Steel expects our suppliers to have a strong due diligence process in place to avoid any conflict minerals from these critical mines to enter our supply chain. Mitigations at supplier level needs to be demonstrated once risks of violating this commitment is detected.

Principle 2: Health & Safety

2.1. Health and safety management

2.1.1. Supply Chain Partners shall provide a safe and healthy workplace for their workforce, comply with Laws and industry standards (OHSAS 18001 or equivalent) for health and safety, and adopt measures to prevent accidents, injuries, and illnesses.

2.1.2. Supply Chain Partners shall take adequate steps to minimize the causes of hazards inherent in the working environment and provide adequate training to all its employees, workers, and contractors on health and safety matters, and their overall wellbeing.

2.2. Emergency preparedness and response

2.2.1. Supply Chain Partners shall develop and implement emergency response plans and maintain high level of preparedness to address potential accidents, natural disasters, and other emergencies that could impact the environment, health, and safety of their employees, communities, and other stakeholders.

Principle 3: Human Rights

3.1. Key Rightsholders

- 3.1.1. Supply Chain Partners shall identify key rightsholders and prioritize human rights issues for their businesses. They shall establish redressal mechanisms to address and remediate human rights issues for all key rightsholders.

3.2. Non-discrimination

- 3.2.1. Supply Chain Partners shall not discriminate against any worker or employee based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by Laws, in hiring and other employment practices.

3.3. Anti-harassment and respectful workplace

- 3.3.1. The Supply Chain Partners shall always uphold the dignity of its employees, workers, contractors and shall work towards establishing and reinforcing a respectful work culture.
- 3.3.2. Supply Chain Partners shall prohibit harsh or inhumane treatment, violence, sexual harassment or abuse, corporal punishment, mental or physical coercion, bullying, verbal abuse, or any form of threat to their employees or workers or contractors.

3.4. Child and forced labour

- 3.4.1. Supply Chain Partners shall not employ, engage, or otherwise use any form of child labour at their workplace. The company encourages Supply Chain Partners to participate in industry efforts aimed at the elimination of such practices wherever they exist in their supply chain.
- 3.4.2. Supply Chain Partners shall not engage in any instance of forced, bonded or compulsory labor and/or slavery or human trafficking at their workplace. All employment with Supply Chain Partner shall be voluntary and employees shall be free to leave their employment in compliance with Laws and contracts. Employees or workers will not be required to surrender any government-issued identification, passports or work permits as a condition of employment.

3.5. Wages and benefits

- 3.5.1. Supply Chain Partners shall comply with Laws related to minimum wages, duration of payment, overtime hours, equal remuneration and other elements of compensation. All legally mandated benefits like leaves, social security, insurance, healthcare etc. shall be provided by the Supply Chain Partner to its employees.

3.6. Working hours

3.6.1. Supply Chain Partners shall comply with Laws and industry standards related to working hours including maximum daily and weekly work hours, overtime, and rest breaks.

3.7. Freedom of association and collective bargaining

3.7.1. Supply Chain Partners shall recognize and respect the right of their workers to associate with others, form, and join organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment in compliance with Laws.

Principle 4: Environmental Protection

4.1. Environmental Management

4.1.1. Supply Chain Partners shall comply with Laws and industry standards relating to the environment.

4.1.2. Supply Chain Partners is encouraged to develop and implement practices that reduce negative environmental impacts and have processes in place to optimize the use of natural resources, reduce the release of harmful emissions, solid waste, wastewater in the environment and produce environmentally compatible products and services.

4.1.3. Supply Chain Partners shall strive for environmental sustainability, particularly regarding the reduction of greenhouse gas emissions, water use, energy consumption, minimum/no use of toxic substances, and minimum and environmentally compatible and recyclable packaging.

4.2. Biodiversity

4.2.1. Tata Steel requires suppliers to demonstrate a commitment to biodiversity by sourcing materials and services that minimize negative impacts on ecosystems and promote sustainable land use, water conservation, and habitat protection. Suppliers must actively support biodiversity initiatives and provide regular reports on their environmental practices, ensuring alignment with Tata Steel's sustainability goals.

4.3. Reclamation and closure planning

4.3.1. Plants or mines in our supply chains shall have a proper closure planning, compatible with the protection of human health and the environment.

4.4. Deforestation

4.4.1. Suppliers shall identify and minimize the impact of potential forest destruction at every stage of their business operations and make efforts to restore damaged forests when necessary. They shall establish procedures and governance for developing business strategies, decision making process, and conduct long-term risk analysis where deforestation issues are considered.

4.5. Hazardous material management

- 4.5.1. Supply Chain Partners shall identify, label, and responsibly manage hazardous materials, such as chemicals, industrial waste, and other hazardous substances, in accordance with Laws and ensure that their handling and disposal do not harm the environment, public health or safety. Any material safety information for hazardous or toxic substances shall be written in the primary language of the workforce. The employees and workers who encounter such materials shall be trained to handle such hazardous substances.

Principle 5: Local community development

- 5.1. We expect our suppliers to contribute to the social, economic, and institutional development of the communities where they operate in alignment with the United Nations Sustainability Development Goals (UN SDGs) to help secure a sustainable future for the next generations.
- 5.2. We also recognize that the operations of our broad range of suppliers and the communities in which they are present vary widely and so compliance with this building block will differ between suppliers, but should be based on case studies and, where relevant, the adoption of suitable policies.

Reporting Violations

The Supply Chain Partner shall notify Tata Steel regarding any known or suspected improper behavior by the Partner or its value chain partners relating to its dealings with Tata Steel, or any known or suspected improper behavior by Tata Steel employees through the following channels:

Reported violations will be treated confidentially without retaliation.

Operations	Channel 1	Channel 2	Channel 3
Tata Steel India	Writing email to: ethics.counsellor@tatasteel.com	Letter to CEC: Mailbox No: G-33 Tata Steel, Jamshedpur, 831001	Speak Up Toll Free No: 1800 102 0875 www.in.kpmg.com/ethicshelpline/tslindia tatasteel@ethicshelpline.co.in <i>P. O. Box No 71, DLF Phase 1, Qutub Enclave, Gurgaon - 122002, Haryana, India</i>
Tata Steel Netherlands	Writing to the Managing Director of Tata Steel Nederland Services BV in the position of Director Integrity & Asset Protection TSN	Writing to the Director Legal & Compliance TSN	Integrity Line confidential reporting system – https://tsn.integrityline.com

Tata Steel UK	TSUK's Confidential Reporting System: https://tsuk.integrityline.com/		
Tata Steel Thailand	Email: tell@thailand-ethicsline.com Subject: TCOC Helpline Services	Post: TCOC Helpline Services P.O. Box 2712, Bangrak Post Office, Bangkok 10500	1-800-292-777 (Toll Free) or 02-677-2800 Call times: 8:30 am - 5:30 pm Monday - Friday (Except public holidays)

Responsible Sourcing Regulations

Where applicable, our entities shall adhere to the regulatory requirements for Responsible Sourcing including but not limited to Standard for responsible sourcing BES 6001, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, UK Modern Slavery Act, Corporate Sustainability Reporting Directive and Cooperate Sustainability Due Diligence Directive, etc.

Progress reporting

Progress of the implementation of our Responsible Supply Chain Policy shall be reported in the combined annual Tata Steel Sustainability Report

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