A black and white portrait of Jamsetji Tata, an elderly man with a long, full white beard and mustache, wearing a dark, textured cap. He is looking slightly to the right of the frame.

*“ In a free enterprise,  
the community is not  
just another stakeholder  
in business but is in  
fact the very purpose  
of its existence.”*

*– Jamsetji Tata*

## Table of Contents

1. Introduction .....	3
2. Sustainability Guidelines .....	5
a. Governance .....	5
b. Legal Compliance .....	6
c. TATA Code of Conduct .....	7
d. Management System Certificate .....	7
e. Environment .....	8
f. Health and Safety .....	10
g. Labour and Human Rights .....	12
h. Transparency and Reporting .....	13
3. Acknowledgement by Supplier .....	14
4. Annexures	
a. Tata AutoComp Safety and Health Policy .....	15
b. Tata AutoComp Sustainability Policy .....	16
c. Tata AutoComp Affirmative Action Policy .....	17

## Introduction:

The Tata group is unique in the world of capitalism, owned at the investment holding company level principally by charities that are committed to giving back to society. The Tata group has earned a reputation for path-breaking initiatives, many well ahead of their time, always placing the community and its interests at heart. Tata AutoComp Systems Ltd., a Tata Group Company, is proud of the legacy of ethos & values of the group and has always strived to exceed the expectation of the group.

It is Tata Group's policy to be in compliance with applicable laws and regulations of the countries where we operate and conduct business in an honest and ethical manner. We understand the significance of Environmental, Social & Governance (ESG) aspects to improve our triple-bottom performance and demonstrate Corporate Citizenship

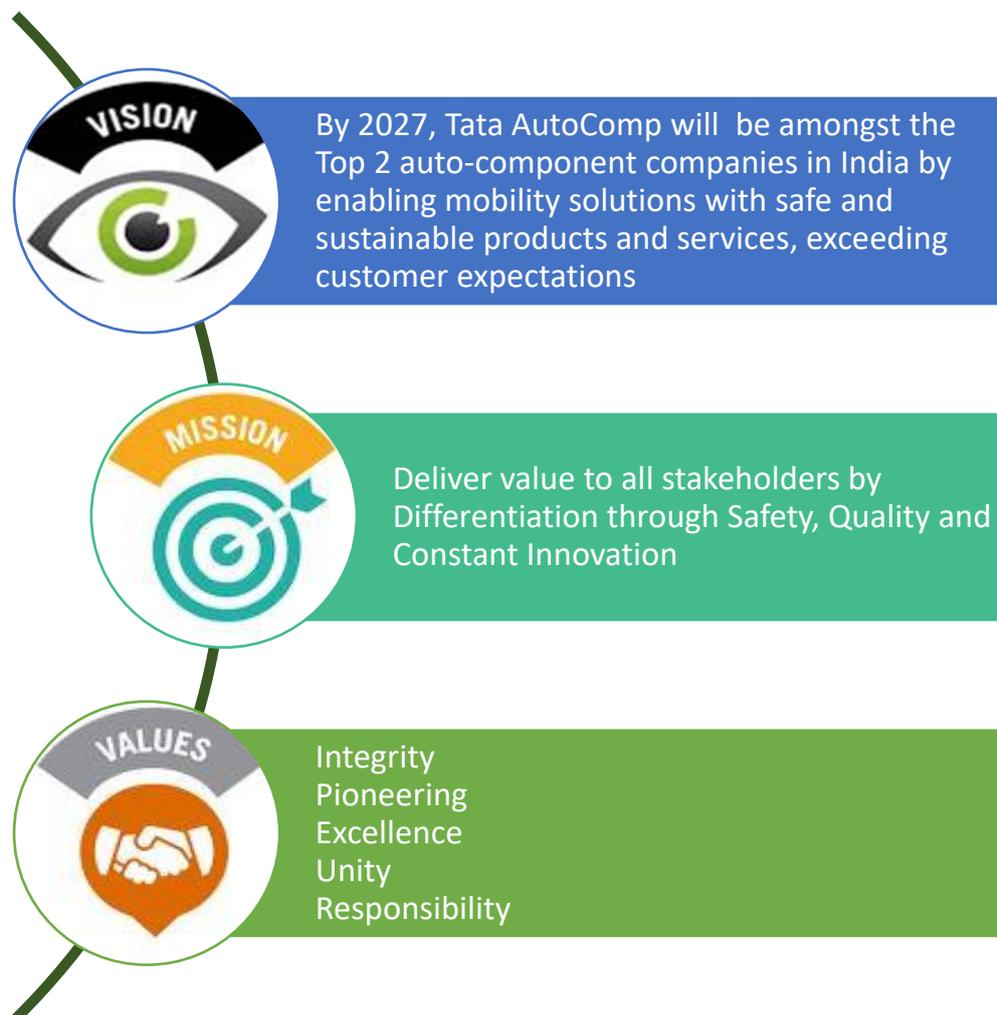
Being a responsible organization and contributor to nation building activities we expect our suppliers & service providers to adhere to all applicable laws, regulations & other requirements and strive to comply with best practices of industry. It is expected out of suppliers/service providers to address the ESG aspects and improve their standards on environmental, health & safety, human rights & labor policies, business ethics and community engagement initiatives.

Tata AutoComp in pursuit to build best in class products would like its suppliers and sub-tier suppliers to do business ethically and honestly. Tata AutoComp would like to seek business relationship and do business with existing suppliers who share the same value system as we do. Therefore, we encourage our suppliers to adopt these sustainability guidelines. The sustainability requirements described in this document should be factored positively by suppliers to minimize ecological and social impacts in supply chain, which cannot be accomplished without the cooperation of every single supplier around the world, supplying parts and material to Tata AutoComp. These guidelines will be used by Tata AutoComp to conduct sustainability assessment of suppliers and service provider.

## About Tata AutoComp Systems Limited:

Tata AutoComp Systems Limited was established in 1995 to bring auto component technologies into India to serve the emerging Indian auto industry. Tata AutoComp is in the business of design, development, manufacturing & supply of auto-component products and services. It operates through its own divisions & business units which are 100% owned subsidiaries or joint ventures. These products and services are being delivered to Automotive OEMs including Passenger Cars, Utility Vehicles, Commercial Vehicles including Bus, Two Wheelers, Aftermarket Channel and also other auto-adjacent Industries like Farm Equipment, Construction equipment & Genset manufacturers.

## Vision, Mission and Values:



## Sustainability Guidance

These Sustainability Guidelines for Suppliers set forth minimum expectations for suppliers with respect to sustainability aspects covering Environmental, Social and Governance (ESG) practices. These guidelines are in addition to, and not in lieu of, provisions of any legal agreement or contract between suppliers and Tata AutoComp. Also, it does not create any third-party beneficiary rights for the Supplier.

### A. Governance

1. Responsibility of Safety, Health, Environment (SHE) & Sustainability should be with the highest level such as at Board/Senior Management level of the supplier organization.
2. Supplier should have a Policy on Safety, Health & Environment, which should be communicated to all and displayed at prominent locations in the offices and facilities, including on their website.
3. Suppliers should have a SHE & Sustainability Committee chaired by a Senior Management person that meets at least once a quarter to discuss issues related to Safety, Health, Environment & Sustainability and monitor performance against targets.
4. Supplier should have designated SHE & Sustainability personnel. It can be a full time or an additional responsibility depending on nature/size of the Organization. The position/grade of these personnel must also be appropriate to the size, scale, complexity & risk of operations.
5. Senior Management should demonstrate visible commitment through various actions like integrating SHE in business planning, allocation of necessary resources, rewarding good behaviour etc.

## B. Legal Compliance

1. Suppliers and their designated manufacturing facilities must fully comply with applicable laws and regulations, including but not limited to those related to safety, health, environment and Labour.
2. Tata AutoComp is aware that in many jurisdictions in which its suppliers conduct business, the differences between local, regional and national laws can cause confusion. Tata AutoComp position is that when there is a difference between the terms of applicable laws, the suppliers should adhere to the most stringent applicable requirement.
3. Suppliers should maintain the list of applicable legal & other requirements and regularly evaluate amended and new requirements and keep it up-to-date.
4. Suppliers shall possess current and valid permissions / consent / clearances / authorizations, related to SHE (Safety, Health & Environment) from appropriate Statutory Bodies for manufacturing units & premises where you operate. Also ensure that necessary permissions are renewed from respective State, Union Territory, and Local Statutory Body as applicable and kept up-to-date.
5. Suppliers should proactively inform Tata AutoComp through email at [Suppliers.Sustainability@tataautocomp.com](mailto:Suppliers.Sustainability@tataautocomp.com) about litigations filed against the Company on Safety, Health, Environmental and social grounds or 'show cause' or 'closure' notices issued by any statutory authorities against any of its units.
6. To ensure consistent legal compliance, suppliers should designate an employee or employees who are responsible for factory compliance with applicable laws and standards. The designated employees must have sufficient understanding of factory operations to ensure compliance at the facility level. In addition, the designated employee or employees must understand that they are accountable for compliance with applicable laws and Tata AutoComp standards & requirements.
7. Suppliers should adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances of concerns in products and manufacturing, including labelling for recycling and disposal such as Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Reduce, Reuse, Recycle (RRR) and End of Life Vehicle (ELV).

8. Suppliers should ensure that the Tantalum, Tin, Tungsten and Gold (3TGs) in the products/components they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these “Conflict Minerals” and make their due diligence measures available to Tata AutoComp as & when necessary.

### C. TATA Code of Conduct

1. All suppliers should adhere to the Principles of TATA Code of Conduct (TCoC) in letter and spirit.
2. Suppliers should have a mechanism to receive and resolve the concerns / complaints of internal and external stakeholders and maintain its records.
3. Supplier should have a policy on Prevention, Prohibition and Redressal of Sexual Harassment at the Workplace (POSH) and maintain its records.
4. The Supplier shall notify Tata AutoComp regarding any known or suspected improper behaviour by the supplier relating to its dealings with Tata AutoComp, or any known or suspected improper behaviour by Tata AutoComp employees by email to: [whistle.blower@tataautocomp.com](mailto:whistle.blower@tataautocomp.com)
5. The TATA Code of Conduct (TCOC) and Whistle Blower policy is available on our website at <https://tataautocomp.com/code-of-conduct/>

### D. Management System Certificate

1. Suppliers should implement Management Systems for Environment (ISO-14001), Occupational Health and Safety (OHSAS-18001) and/or (ISO-45001) with third party certification.
2. Tata AutoComp also encourages suppliers to adopt the IMS (Integrated Management System) approach which combines these international standards in one system.

## E. Environment

1. Suppliers shall ensure that every manufacturing facility complies with environmental laws, including consent & authorization conditions related to effluent discharges, waste disposal, air emissions and hazardous chemicals & waste storage, handling & disposal.
2. Suppliers should adopt precautionary principles with life cycle perspective for prevention of pollution and minimizing the adverse impact on the environment, natural resources and the community.
3. Suppliers should strive to reduce their resource consumption intensity & waste generation intensity at least by 5% on year on year basis.
4. Suppliers should strive to reduce fresh water consumption and increase recycling of treated effluent. Water consumption records, including water bills and meter readings should be maintained.
5. Suppliers are also encouraged to implement rainwater harvesting initiative. If water is extracted on-site, suppliers shall obtain and maintain the ground water extraction permits from statutory authorities as applicable.
6. Wastewater generated from processes and facilities should be monitored and treated before discharge or disposal. In addition, measures should be implemented to reduce generation of wastewater. Suppliers should effectively maintain and monitor performance of its Effluent Treatment Plants (ETPs).
7. Supplier should prevent contamination of storm water runoff and illegal discharges and spills from entering into storm water drains.
8. Air emissions from stationary and non-stationary sources should be monitored and treated as required, prior to discharge. Suppliers should effectively maintain air pollution control system and regularly monitor the air emissions.
9. Suppliers should track their energy consumption and greenhouse gas (GHG) emissions. Climate Change is one of the key material issues and suppliers are expected to improve energy efficiency and reduce GHG emissions from all direct and in-direct sources.
10. Suppliers should implement energy conservation initiatives and strive to improve usage of renewable energy for minimizing the carbon footprint.
11. Use of natural finite resources and generation of waste of all types should be minimized or eliminated at source and by practices such as elimination, substitution, segregation, conservation, reuse, recycling and recovery.

12. Suppliers should implement systematic approach for reducing, recycling and safe disposal of hazardous and non-hazardous solid waste.
13. Hazardous chemicals should be identified and managed to ensure safe handling, storage, use, and disposal. Inventory of hazardous substances should be maintained and up-to-date Material Safety Data Sheet (MSDS) for each substance should be available at site. Workers must be appropriately trained in pollution prevention, associated hazards, storage, handling and response measures in accordance with the MSDS. Extract of MSDS should be displayed in working areas.
14. Suppliers should obtain and maintain the appropriate permits for land use and protection of biodiversity as required by law. Suppliers shall comply with applicable legal requirements regarding protected areas. Environmental Impact Assessment should be carried out as per regulatory requirements.
15. Suppliers should regularly monitor noise levels and should take immediate corrective action if noise pollution limits are exceeding the regulatory norms.
16. Suppliers should work in time-bound manner to
  - (a) Optimize logistics to lower the distance travelled
  - (b) Use efficient mode of transport
  - (c) Optimize packaging to lower the total quantum of packaging to be scrapped at Tata AutoComp
  - (d) To increase the % content of re-cycled materials in the packaging material.
17. Supplier should have a mechanism to capture concerns and complaints related to environment from external interested parties and maintain records of the same.

## F. Health and Safety

1. Suppliers should provide employees and all those working at site, with a safe and healthy work environment and take proactive measures to prevent or manage workplace hazards and promote the general health of employees.
2. Suppliers should build safety culture in the organization and all levels of employees including senior management should demonstrate “Safety First” approach.
3. Suppliers should have procedures and systems to track and report occupational injuries & illnesses, classify and record injury and illness cases, provide necessary medical treatment, conduct incident investigation and implement corrective actions to eliminate their causes and prevent recurrences.
4. Suppliers should conduct Hazard Identification & Risk Assessment (HIRA) of routine & non-routine activities and establish controls on associated risks to reduce work-related injuries and illness.
5. Suppliers should provide training on safety & health procedures, rules, systems & standards to employees, both permanent and contract employees in their primary language. No employee should be put on the job without prior safety training. Workers shall be encouraged to raise safety concerns.
6. Employees should be provided with appropriate, well-maintained PPEs.
7. Suppliers should maintain appropriate First Aid boxes as mandated by law.
8. Work zone including noise levels should be regularly monitored and over-exposure to employees working in the area should be avoided.
9. Exposure to the hazards of manual material handling and heavy or repetitive lifting, bending, twisting, prolonged standing and highly repetitive or forceful assembly jobs should be identified, evaluated, minimized and controlled using ergonomic designs and techniques.
10. Suppliers should identify potential emergency situations and put in place emergency preparedness response plans for minimizing harm to life, environment and property. It should cover; emergency reporting, evacuation procedures, assembly points, training, mock-drills, appropriate firefighting system and adequate exit facilities. Suppliers should conduct mock drills at least once per year or as mandated by law and effectiveness of emergency preparedness should be evaluated and improved.
11. Suppliers should provide clean toilet facilities, access to potable water, with reasonable space and adequate lighting and ventilation.

12. Suppliers should ensure that passages, exits and staircases are kept clear and unblocked at all times. Exits are clearly marked and kept unlocked during working hours. Exit doors should be unlocked from the inside, open outwards and need no special operation.
13. Suppliers should have disaster management plans and procedures as applicable.
14. Being part of automobile industry, suppliers should sensitize employees and driver community on road safety and on-road emissions by providing training and disseminating information on Road/Driving Safety, Defensive Driving Training (DDT), eco-driving habits, regular maintenance of vehicles, maintaining valid driving license, insurance and PUCs.

## G. Labour & Human Rights

1. Suppliers are expected to protect and uphold the human rights and treat employees with dignity and respect. Suppliers should not use any form of forced, bonded, indentured, or child Labour.
2. Child labour shall not be used at any stage by the suppliers, including its tier suppliers. Suppliers should not employ any person below the age of 18 yrs.
3. Forced labour, slavery or trafficking of persons should not be used under any circumstances. All work shall be voluntary, and workers should be free to leave work or terminate their employment with reasonable notice period.
4. Working hours and workweeks should not exceed the maximum limit set by the regulatory authorities.
5. Suppliers shall abide by the rules with respect to payment of minimum wages as per regulatory requirements. Workers shall be compensated for overtime in compliance with local laws. Deductions from wages as a disciplinary measure should not be permitted. For each pay period, workers should be provided with a timely and understandable wage statement with sufficient information to verify accurate compensation for work performed. All use of temporary and outsourced labour should be paid as per the local law.
6. Employees should not be treated in an inhumane manner. This includes sexual harassment, sexual abuse, physical reprimand and physical and mental abuse. It also applies to the threat of such treatment.
7. Suppliers should not discriminate on the basis of race, colour, national origin, age, gender, sexual orientation, religion, disability or other similar factors. Employees should be treated with respect and dignity.
8. Suppliers should respect the right of workers to associate freely, form and join worker's organizations of their own choosing, seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations. Suppliers shall not discriminate with respect to employment based on union membership and, in particular, should not make employment subject to the condition that the worker relinquish union membership or cause of dismissal for not joining in the union. Harassment, intimidation, penalties, interference or reprisal should not be used to interfere with such legitimate activities.
9. Suppliers should provide means for their employees to report concerns or potentially unlawful and unethical activities in the workplace. Any report should be treated in a confidential manner. Suppliers should investigate such reports and take corrective action if needed.

## H. Transparency and Reporting

1. Suppliers should have a process of internal & external auditing with respect to SHE and should carry out internal audits at least once in 6 months and external audits once in a year.
2. Suppliers should publish the sustainability report as per globally recognized framework like GRI and should get it assured by the independent agency. Suppliers should also publish the Annual Business Responsibility Report (ABRR).
3. Suppliers should display Sustainability Report, ABRR and Annual Report on its website for stakeholders.
4. Suppliers should respond to Tata AutoComp communications regarding sustainability expectations in a time-bound manner as required.

## Acknowledgement by Supplier

We hereby confirm that we have received and taken due note of the contents of the Tata AutoComp Sustainability Guidelines for Suppliers.

We will strive to comply with these Sustainability Guidelines based on a development oriented approach and without amendment or abrogation. We will report to Tata AutoComp in case of any violations of these guidelines.

We will communicate Tata AutoComp Sustainability Guidelines to our employees, subcontractors and tier suppliers, and encourage them to implement these guidelines and ensure that they also comply with the provisions incorporated therein.

<b>Company Name</b>	
<b>Name &amp; Designation of Signatory Authority</b>	
<b>Signature &amp; Stamp / Seal of Company</b>	
<b>Company Registration No/ Statutory ID / Code Number</b>	
<b>Date</b>	
<b>Place</b>	

**Note** - Please email signed copy (scanned) of this document, mentioning your **Vendor Code** in the subject line.

## Tata AutoComp Systems Limited

### SAFETY AND HEALTH POLICY

Tata AutoComp is committed to providing a safe and healthy working environment and achieving an injury and illness free workplace. Economic considerations will not have priority over implementation of safety & health protection measures. While safety is everyone's prime responsibility, Senior Leaders are expected to demonstrate visible commitment through their behavior. To meet our commitment, we will;

- Recognise safety and health as an integral part of our operations; consider Safety and Health in every decision we make and in every activity we perform.
- Comply and endeavor to exceed applicable regulatory safety and health requirements and set the highest standards.
- Impart appropriate training and develop skills by engaging employees to help them work safely.
- Assess risks and provide controls for safety & health hazards in our operations and activities and use audits to check compliance.
- Promptly report incidents, investigate for root causes and ensure lessons learnt are shared and deployed across Tata AutoComp, its divisions, subsidiaries and Joint Ventures.
- Influence our business partners in enhancing their Safety and Health standards.
- Set Safety and Health metrics as indicators of excellence, monitor progress and continually improve performance.

We aspire to become world leaders and be a benchmark in safety and health performance in our respective businesses. The key is in internalisation of safety and engagement with our employees.



**Arvind Goel**

**MD & CEO**

## Tata AutoComp Systems Limited

### SUSTAINABILITY POLICY

#### Our Philosophy

Tata AutoComp is committed to integrate environmental, social and ethical principles into its business which is central to improving the quality of life of the communities we serve globally and enhancing long-term stakeholder value.

#### Our Principles

Our companies shall:

- Integrate sustainability considerations into all business decisions and key work processes, with the aim of creating value, mitigating future risks and maximizing opportunities.
- Follow the highest standards of governance and transparency.
- Embody principles of product stewardship by enhancing health, safety, environmental and social impacts of products and services across their lifecycles.
- Provide employees and business associates with working conditions that are clean, safe, healthy and fair.
- Strive to be neighbours of choice in the communities in which we operate and contribute to their equitable and inclusive development.

#### Our Commitments

Our companies will aspire for sustainability leadership in the sectors in which we operate. To achieve this, we will:

- Constitute a governance structure to oversee our sustainability commitments.
- Identify relevant and material sustainability issues and develop comprehensive sustainability strategies with goals, targets, mitigation and adaptation action plans to address them under the aegis of our boards.
- Undertake natural and social capital valuation to assess business risks.
- Report in line with TATA Group reporting frameworks.



**Arvind Goel**

**MD & CEO**

## Tata AutoComp Systems Limited

### AFFIRMATIVE ACTION POLICY

Tata AutoComp Systems Limited believes in social equity.

- The company adheres to the principle of equal opportunity, irrespective of caste, whether in recruitment or career advancement within the organization.
- The company is also committed to directly conducting or supporting initiatives to ensure an equal footing for socially and economically disadvantaged sections in the country at large, and specifically the Scheduled Caste and Scheduled Tribe communities.
- Towards the ultimate goal of enhancing their employability and entrepreneurship abilities, Tata AutoComp is committed to creating and promoting access to quality education and technical skills and competencies for members of the SC/ST communities
- Further, to speedily enable these communities overcome the social discrimination that has prevented them from realizing their potential as productive members of society, Tata AutoComp will assist members from these communities for employment opportunities and as business associates, provided everything else (merit for employment; cost and quality for business associates) is equal.



**Arvind Goel**

**MD & CEO**