



AO/ 394 /2019

28 MAY 2019
CIRCULAR

Whistle Blower Policy for Business Associates

In compliance with Tata Code of Conduct and in furtherance with Tata Steel Limited's (Company's) policy to encourage and protect genuine Whistleblowing by Business Associates, a Business Associates' Whistleblowing Protection Policy' ("Policy") has been developed.

Definitions:

"Protected Disclosure" means any communication in relation to matters concerning the Company, which is made in good faith and which discloses information that may evidence demand for illegal gratification and/or unethical or improper activity of serious nature, by any Employee, Director or Business Associate

"Business Associate Whistleblower" means a person/organization registered in the Vendor or Customer data base of the Company, making a Protected Disclosure and thereafter extending whatever assistance may be required in establishing facts mentioned in the Protected Disclosure.

Procedure:

Protected Disclosures should preferably be reported in writing i.e. in ink or electronically, and should be factual (not speculative) so as to ensure a clear understanding of the issues raised by the Whistle Blower.

Misconduct concerning the Chief Ethics Counsellor and employees at the levels of Vice President and above, should be addressed to the Chairperson of the Audit Committee of the Company and those concerning other employees, should be addressed to the Chief Ethics Counsellor of the Company.

The Whistleblower must disclose his/her identity in the covering letter forwarding such Protected Disclosure. Anonymous disclosures will not be entertained as it would not be possible to interview the Whistleblowers.

The contact details of the Chairperson of the Audit Committee and of the Chief Ethics Counsellor of the Company are as under:

Chairperson of the Audit Committee:

Mr. O. P. Bhatt,

Tata Steel Limited, Bombay House, 24, Homi Mody Street, Fort, Mumbai - 400 001

Chief Ethics Counsellor:

Mrs. Soni, Chief Ethics Counsellor, Tata Steel Ltd. Jamshedpur 831 001.

E-mail: ethics.counsellor@tatasteel.com, son@tatasteel.com

Protection to the Business Associate Whistleblower:

The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair practice being adopted against the Business Associate Whistleblowers while conducting business with the Company.

TATA STEEL LIMITED

Office of CEO & Managing Director Jamshedpur 831 001 India

Tel 91 657 2424602 Fax 91 657 2431818 e-mail mdoffice@tatasteel.com

Registered Office Bombay House 24 Homi Mody Street Fort Mumbai 400 001

Tel 91 22 66658282 Fax 91 22 66657724

Corporate Identity Number L27100MH1907PLC000260 Website www.tatasteel.com



The Business Associate Whistleblower shall be protected from any retaliation, threat or intimidation of untimely termination/suspension of their contracts/orders, refusal from issuance of RFQ (Request For Quotation) to them, or any direct or indirect use of authority to obstruct the Business Associate Whistleblower from continuing to execute their jobs, including making further Protected Disclosures. Should, in spite of best efforts by the Company, the identity of the Business Associate Whistleblower becomes known during the investigation, the Chief/ Head of the concerned user departments, shall ensure that the Business Associate Whistleblower, is provided with all the assistance required to execute existing orders.

Under no circumstances, subjects against whom the disclosures have been made should compel investigator to disclose the identity of the Business Associate Whistleblower.

Disqualifications:

Any abuse of this protection by Business Associates will warrant disciplinary action.

Business Associate Whistle Blower Protection:

The Company has constituted the Ethics Committee In case a Business Associate Whistleblower feels that they have been victimized because of reporting about an unethical act, they can submit a "Grievance" to the Chief Ethics Counsellor/ Chief Vigilance, giving specific details of the nature of victimization allegedly suffered by them. All such grievances will be forwarded to the Ethics Committee. The Ethics Committee may conduct necessary investigation of the concern and recommend appropriate action as the case may be.

Amendment:

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.

Notification to this Policy:

Chief Ethics Counsellor shall ensure that an approved copy of this Policy and its subsequent amendments, if any, are hosted on the Tata Steel website for information of all Business Associates. This supersedes our earlier Whistleblower Policy for Business Associates (Ref. No. AO/226/2017 Dt. 23/05/2017)

T V Narendran
CEO & Managing Director

Copy to : CEO & MD's Office
: All ILIs
: All members of the committee
: HRM Services

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