

Communication of TCoC and Governing Policies at Titan - The Right Way at Titan Approach

1. Purpose

This approach is meant to enable or guide the employees/ stakeholders to communicate effectively with all categories and segments of employees on the Tata Code of Conduct / Ethical work practices at Titan. As a practice, Titan has over the years reinforced the Right way towards Management of Ethics. The Company constantly strives to innovate and benchmark itself with the best in ensuring a consistent communication of a need for a respectful and safe workplace.

2. Scope

Covers all categories of Employees working on the rolls of the company or off rolls.

3. Responsibility

It's the responsibility of the Chief Ethics Counsellor and the team of Ethics counsellors to carry out the above communication that would also cover receiving, investigating and closure of ethical issues.

4. Process

- 4.1 The Ethics office will make available the updated version of the TCoC and the Governing Policies on Ethical Conduct Version 2.0 for all employees through the HR portal, posters, booklets etc.
- 4.2 Every individual who joins the company will be given an induction on the TCoC and Governing Policies, and will be asked to sign the declaration form available and the same is handed over to HR/ethics counsellor.

- 4.3 Ethics counsellors are trained to communicate, interpret and also deploy the understanding of the TCoC/Governing policy requirements in the local language in their respective areas.
- 4.4 Every year reinforcement of the TCoC / Governing policy requirements is done through cascades either in person or through digital media to all employees. Other means are used to reinforce the communication through theatre plays, workshops, floor walks and localised communication by ethics counsellors on a need to have basis. Leadership team members are present in all these sessions to ensure role modelling and also to respond to queries and clarifications.
- 4.5 Titan will use various survey mechanisms to gauge the employee understanding and obtain feedback on the ethics communication such as Tell ME and MBE survey, and will act upon the findings.
- 4.6 During the communication sessions, special emphasis will be given to those policies that are covered under the Governing Policies. The communication mechanisms also reinforce aspects of how to respond to an ethical issue and briefly mention about redressal mechanisms.

Note: Apart from the policies / guidelines in the TCoC and Governing Policies, different process owners communicate policies that may be relevant for specific departments/ functions/employee groups on a regular basis. It may also be noted that within the company there are many policies and practices that are in place in addition to the policies covered under the Governing policies. These are defined and driven by different stakeholders. For example the policy around Information security is driven by the IT function. Details of these are available with the ethics management team at Corporate.

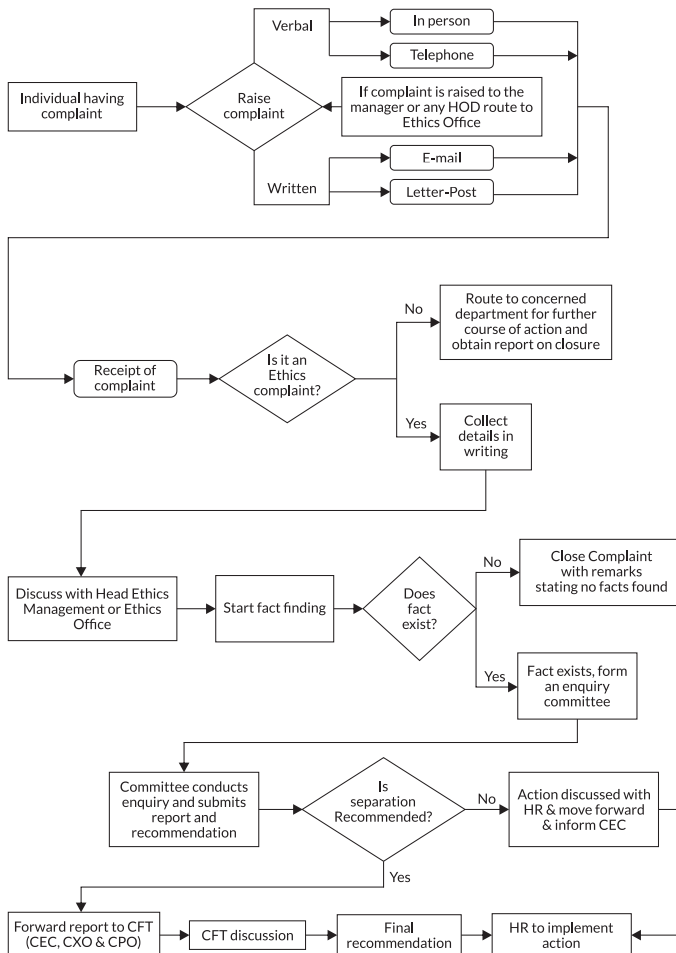
Communication of The Right Way at Titan to other stakeholders

Being a responsible citizen in upholding the true Tata values, Titan strives to ensure all its stakeholders - business associates, vendors, and contractors are adequately apprised of the policies and also enable them in better governance of their own organisations.

This includes conducting awareness sessions, training identified people as ethics champions and guiding them to deal with issues should they arise. It may however be noted that while Titan strives to communicate, and make the associates aware, the primary ownership of implementation of these policies rests with these associate or vendor groups.

The flow chart below gives a brief approach on the process of logging a complaint and how to address the same.

Process to lodge a complaint and closure of complaint



CFT: Cross Functional Team • CEC: Chief Ethics Counselor • CPO: Chief People Officer • CXO: Chief Operating Officer

