

Company Name Tata Motors
Industry Automobiles
Overall Score (*) 11.7 out of 100

Theme Score	Out of	For Theme
1.8	10	A. Governance and Policies
0.5	25	B. Embedding Respect and Human Rights Due Diligence
2.5	15	C. Remedies and Grievance Mechanisms
1.6	20	D. Performance: Company Human Rights Practices
2.3	20	E. Performance: Responses to Serious Allegations
3.0	10	F. Transparency

(*) While other sectors are being measured against a reduced set of CHRB Core UNGP Indicators this year the Automotive Manufacturing sector is being measured against the full CHRB Methodology as it is the first year that the sector has been analysed.

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Company states that 'We shall respect the human rights and dignity of all our stakeholders' [Tata Code of Conduct, 29/07/2015: tata.com] Score 2 • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: ILO Core: The Company states that '8. We do not employ children at our workplaces; 9. We do not use forced labour in any form' and 'We shall strive to balance the interests of our stakeholders, treating each of them fairly and avoiding unfair discrimination of any kind.' In addition, it states that '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 as per the 'Conflicts of Interest' clause of this Code and in accordance with applicable company policies and law.' However, no clear commitment found regarding non-

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			<p>discrimination, freedom of association and collective bargaining. [Tata Code of Conduct, 29/07/2015: tata.com]</p> <ul style="list-style-type: none"> • Not met: UNGC principles 3-6 • Not met: Explicitly list ALL four ILO for MO suppliers: The Company states that 'a) The Suppliers shall not employ children at their workplaces; b) The Suppliers shall not use forced labour in any form.' However, no evidence regarding non-discrimination, freedom of association and collective bargaining was found. [Tata Motors Supplier Code of Conduct, 27/09/2016: tatamotors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core • Met: Respect H&S of workers: The Company states that 'we are committed to being an injury-free organisation, ensuring the safety and health of employees, contractors and visitors in our operations'. [Safety and Health Policy, 18/03/2016: tatamotors.com] • Met: H&S applies to MO suppliers: The Company states that 'The Suppliers shall strive to provide a safe, healthy and clean working environment for its employees'. [Tata Motors Supplier Code of Conduct, 27/09/2016: tatamotors.com] • Not met: Working hours for workers • Not met: Working hours for MO suppliers
A.1.3.MO.a	Commitment to responsible sourcing of minerals	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Responsible mineral sourcing in conflict areas: The Company states that 'Tata Motors Limited ("TML") is committed to promoting and supporting various laws that aim to prevent the use of minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or its adjoining countries (the "Covered Countries"), as contemplated under the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the "Dodd- Frank Act") and the rules and regulations promulgated thereunder ("Conflict Minerals"). TML is committed to sourcing products and materials from companies that share its values around human rights, ethics and environmental responsibility. Consistent with the spirit of related laws, rules and regulations regarding responsible sourcing and Conflict Minerals, including those promulgated under U.S. law, TML is committed to sourcing minerals in a responsible manner'. [2019 SD Form, 29/05/2020: tatamotors.com] • Met: Based on OECD Guidance: The Company states that 'TML intends to continue to develop its Conflict Minerals Compliance Program to be in compliance with the framework in the Organization for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition 2016 and the related supplements on 3TG Minerals in all material respects'. [2019 SD Form, 29/05/2020: tatamotors.com] • Met: Requires suppliers to follow the OECD Guidance: The Company states that 'To ensure its commitment to support the objectives of the Dodd-Frank Act and other similar laws, TML requires its suppliers to comply with the Conflict Minerals reporting requirements and to engage in due diligence of their supply chains in accordance with an internationally recognized framework, such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition 2016'. [2019 SD Form, 29/05/2020: tatamotors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responsible conflict mineral sourcing covers all minerals • Not met: Suppliers expected to make similar requirements of their suppliers
A.1.3.MO.b	Commitment to respect human rights particularly relevant to the industry (ICT)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's Rights • Not met: Children's Rights • Not met: Migrant worker's rights • Not met: Expecting suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: CEDAW/Women's Empowerment Principles • Not met: Child Rights Convention/Business principles • Not met: Convention on migrant workers • Not met: Respecting the right to water • Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company states that 'Engagement aimed at establishing and maintaining mutually beneficial

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			relationships creates both opportunities to enhance performance and manages emerging risks to the business. We focus on creating long-term relations with a range of stakeholders to continuously improve the alignment of interests between the Group and its key stakeholders. We remain committed to maintaining the highest standards of integrity and ethical conduct in dealing with all our stakeholders.' Then, the Company lists its stakeholders and the respective engagement mechanisms. Stakeholder groups include employees, communities, and suppliers, among others. [Annual Report 2018-19, 26/06/2019: tatamotors.com] Score 2 <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design: The Company states that 'Tata Motors engages with stakeholders in designing and implementing the AA interventions. The inputs, and feedbacks from these stakeholders help in conceiving, planning, deploying and improving projects. The company engages with NGOs all-through the project life cycle beginning right from project conception.' The AA program is 'an instrument to bring social equity by making the Scheduled Caste and Scheduled Tribe communities (with preference to women, physically challenged, single women etc.) as our focal points across all the CSR programmes. an instrument to bring social equity by making the Scheduled Caste and Scheduled Tribe communities (with preference to women, physically challenged, single women etc.) as our focal points across all the CSR programmes.' However, no evidence found regarding stakeholder engagement in developing or monitoring its human rights approach. [2018-19 CSR Report, 29/05/2019: tatamotors.com] • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to remedy Score 2 <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with MO suppliers to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) Score 2 <ul style="list-style-type: none"> • Not met: Expects MO suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: CEO or Board approves policy: Regarding the responsibility Statement of the CSR Committee, the Company states: 'The CSR Committee states that the implementation and monitoring of the CSR Policy, is in compliance with the CSR objectives and Policy of the Company.' However, no evidence regarding human rights was found in the Company's CSR policy. [Integrated annual Report 2019-20, 2020: tatamotors.com & CSR Policy, 05/06/2019: investors.tatamotors.com] • Met: Board level oversight for HRs: The Company states that it has a Safety, Health & Sustainability Committee, which is responsible for the following: 'to take a holistic approach to safety, health and sustainability matters in decision making; to provide direction to Tata Motors Group in carrying out its safety, health and sustainability function; to frame broad guidelines/policies with regard to safety, health and sustainability; to oversee the implementation of these guidelines/policies; and to review the safety, health and sustainability policies, processes and systems periodically and recommend measures for improvement from time to time.' Health and safety count as one area of respect for human rights [Integrated annual Report 2019-20, 2020: tatamotors.com] Score 2 <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Board/Committee review of salient HRs: Although the Company has a Board Committee responsible for the Health and Safety area and another responsible for CSR, no details regarding the committee's approach to discussing human rights were found. [Report on Corporate Governance, 23/05/2018: tatamotors.com & 2019-20 CSR Report, 06/2020: tatamotors.com] • Not met: Examples or trends re HR discussion

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			Score 2 • Not met: Both examples and process
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Incentives for at least one board member • Not met: At least one key MO HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to ILO core conventions • Not met: Senior responsibility for HR Score 2 • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for MO in supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Senior manager incentives for human rights • Not met: At least one key MO HR risk, beyond employee H&S Score 2 • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: HR risks is integrated as part of enterprise risk system Score 2 • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to ILO core conventions • Met: Communicates its policy to all workers in own operations: The Company states that 'This Code sets out our expectations of all those who work with us. We also expect those who deal with us to be aware that this Code underpins everything we do, and in order to work with us they need to act in a manner consistent with it.' Furthermore, it requires that its employees sign a document recognizing that they received the Code of Conduct. [Tata Code of Conduct, 29/07/2015: tata.com] Score 2 • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to all 4 ILO core conventions for suppliers • Not met: Communicating policy down the whole MO supply chain: The Company states that 'TML follows the Tata Code of Conduct (TCoC) globally and expect all Suppliers to adhere to the same principles of TCoC. "Supplier" here means any business, company, corporation, person or other entity that provides, sells or seeks to sell, any kind of goods or services to TML, including the Supplier's employees, agents and other representatives.' However, no further details found, including how it communicates the supplier code down the supply chain. [Tata Motors Supplier Code of Conduct, 27/09/2016: tatamotors.com] • Not met: Requiring MO suppliers to communicate policy down the chain Score 2 • Met: How HR commitments made binding/contractual: The Company's Supplier Code of Conduct requires suppliers to sign and abide by a compliance commitment, stating 'We hereby confirm that we have received the TML Supplier Code of Conduct and commit to comply with it in letter and in spirit. We are also aware that these clauses/provisions form an integrated part of Suppliers agreement, signed with TML. We understand that TML reserves the right, upon reasonable notice, to check compliance with the requirements of Supplier Code of Conduct. We understand that TML encourages its Suppliers to implement their own binding Code of Conduct and agree that we will be responsible for complying obligations

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			under this code. Failure to adherence to this code would attract the disciplinary consequences. [Tata Motors Supplier Code of Conduct, 27/09/2016: tatamotors.com] <ul style="list-style-type: none"> • Not met: Including on MO suppliers
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments • Not met: Trains relevant MO managers including procurement Score 2 <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments: The Company states that the CSR Committee is responsible for the following: 'Monitor the Corporate Social Responsibility Policy of the Company from time to time.' However, no evidence regarding how compliance monitoring is carried out within the Company. [Report on Corporate Governance, 23/05/2018: tatamotors.com] Score 2 <ul style="list-style-type: none"> • Not met: Monitoring MO suppliers • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of MO supply chain monitored
B.1.7	Engaging business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: HR affects MO selection of suppliers • Not met: HR affects on-going MO supplier relationships: The Company states that 'Failure to adherence to this code would attract the disciplinary consequences.' However, no evidence regarding the impact on decisions to renew, expand or terminate business relationships was found. [Tata Motors Supplier Code of Conduct, 27/09/2016: tatamotors.com] Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with MO suppliers to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Stakeholder process or systems • Not met: Frequency and triggers for engagement • Not met: Workers in MO SC engaged • Not met: Communities in the MO SC engaged Score 2 <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifying risks in own operations • Not met: Identifying risks in MO suppliers Score 2 <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Salient risk assessment (and context): The Company states that human rights are one of the Group's material issues. However, no evidence regarding specific human rights salient risks was found. [Integrated annual Report 2019-20, 2020: tatamotors.com] • Not met: Public disclosure of salient risks Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Action Plans to mitigate risks Not met: Including in MO supply chain Not met: Example of Actions decided Score 2 <ul style="list-style-type: none"> Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: System to check if Actions are effective Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Comms plan re identifying risks Not met: Comms plan re assessing risks Not met: Comms plan re action plans for risks Not met: Comms plan re reviewing action plans Not met: Including MO suppliers Score 2 <ul style="list-style-type: none"> Not met: Responding to affected stakeholders concerns Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Channel accessible to all workers: The Company states that 'We encourage our employees, customers, suppliers and other stakeholders to raise concerns or make disclosures when they become aware of any actual or potential violation of our Code, policies or law. We also encourage reporting of any event (actual or potential) of misconduct that is not reflective of our values and principles. Avenues available for raising concerns or queries or reporting cases could include: immediate line manager or the Human Resources department of our Company; designated ethics officials of our Company; the 'confidential reporting' third party ethics helpline (if available); any other reporting channel set out in our Company's 'Whistleblower' policy'. Furthermore, 'The contact details of :The Chairman of the Audit Committee are as under: Name: Mr Nasser Munjee Address: Development Credit Bank Limited Peninsula Business Park Tower 'A', 6th Floor, Senapati Bapat Marg, Lower Parel, Mumbai 400 013; The Ethics Counsellor of the Company are as under: Name: Mr Sunil Pundlik – Head Legal Address: Tata Motors Limited Gitaneeel Building, Nagindas Master Road, Mumbai 400 001 Email: ethicsoffice@tatamotors.com and sunil.pundlik@tatamotors.com; Third-party Ethics Helpline are as under: A Whistleblower can report his / her ethical concerns by using the "Speak Up" service at Tata Motors by either calling on 1800 103 2931 or log on to the website speak-up.info and send the concerns. The toll-free Whistleblowing hotline can be accessed 24 hours a day, seven days a week'. [Whistleblower Policy, 26/03/2019: investors.tatamotors.com & Whistleblower Policy, 26/03/2019: investors.tatamotors.com] Score 2 <ul style="list-style-type: none"> Not met: Number grievances filed, addressed or resolved: The Company discloses a chart indicating the number of stakeholder complaints received and resolved, it states: 'The above stakeholder complaints are related to TCoC concerns, investor complaints and POSH complaints. TCoC concerns include complaints related to employee relations, financial impropriety, legal compliance and unfair business practices'. However, no disclosures related to human rights grievances filled found. [Integrated annual Report 2019-20, 2020: tatamotors.com] Not met: Channel is available in all appropriate languages

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			<ul style="list-style-type: none"> • Met: Opens own system to MO supplier workers: The Company states that 'We encourage our employees, customers, suppliers and other stakeholders to raise concerns or make disclosures when they become aware of any actual or potential violation of our Code, policies or law' and 'All employees, directors and stakeholders of the Company are eligible to make Protected Disclosures under the Policy. The Protected Disclosures may be in relation to matters concerning the Company or any other Tata Company.' Tata also indicates that 'Stakeholders means and includes vendors, suppliers, lenders, customers, business associates, trainee and others with whom the Company has any financial or commercial dealings.' [Whistleblower Policy, 26/03/2019: investors.tatamotors.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Grievance mechanism for community: In its whistleblower policy, the Company states that 'We encourage our employees, customers, suppliers and other stakeholders to raise concerns or make disclosures when they become aware of any actual or potential violation of our Code, policies or law.' Furthermore, it presents the following definition: "'Stakeholders" means and includes vendors, suppliers, lenders, customers, business associates, trainee and others with whom the Company has any financial or commercial dealings [...] All employees, directors and stakeholders of the Company are eligible to make Protected Disclosures under the Policy'. However, there is no clear evidence that local communities have access to the grievance mechanism. [Whistleblower Policy, 26/03/2019: investors.tatamotors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages • Not met: Expects MO supplier to have community grievance systems • Not met: MO supplier communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages users to create or assess system • Not met: Example of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: MO suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Response timescales: The Company states that 'The investigation shall be completed normally within 45 days of the receipt of the Protected Disclosure' [Whistleblower Policy, 26/03/2019: investors.tatamotors.com] • Not met: How complainants will be informed: The Company states that 'Subjects have a right to be informed of the outcome of the investigation. If allegations are not sustained, the Subject should be consulted as to whether public disclosure of the investigation results would be in the best interest of the Subject and the Company'. However, no evidence regarding how complainants will be informed was found. [Whistleblower Policy, 26/03/2019: investors.tatamotors.com] • Met: Who is handling the complaint: The Company states that 'All Protected Disclosures reported under this Policy will be thoroughly investigated by the CEC / Chairman of the Audit Committee of the Company who will investigate / oversee the investigations under the authorization of the Audit Committee'. [Whistleblower Policy, 26/03/2019: investors.tatamotors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The Company states that 'We do not tolerate any form of retaliation against anyone reporting legitimate concerns. Anyone involved in targeting such a person will be subject to disciplinary action.' [Whistleblower Policy, 26/03/2019: investors.tatamotors.com] • Met: Practical measures to prevent retaliation: As stated above, 'Anyone involved in targeting such a person will be subject to disciplinary action'. Furthermore, 'The Whistleblower may disclose his/her identity in the covering letter forwarding such Protected Disclosure. Anonymous disclosures will also be entertained.' [Whistleblower Policy, 26/03/2019: investors.tatamotors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects MO suppliers to prohibit retaliation

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C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

D.5 Automotive Manufacturing

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage target timeframe • Not met: Describes how living wage determined Score 2 <ul style="list-style-type: none"> • Not met: Achieved payment of living wage • Not met: Regularly review definition of living wage with unions
D.5.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Living wage in supplier code or contracts • Not met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends demonstrating progress
D.5.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs • Not met: Positive incentives to respect human rights Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.5.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Identifies suppliers back to product source: The Company discloses the location of its facilities. However, no evidence regarding supplier identification was found. [Facilities: tatamotors.com] Score 2 <ul style="list-style-type: none"> • Not met: Discloses significant parts of supply chain and why
D.5.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Does not use child labour: The Company states that 'We do not employ children at our workplaces.' [Tata Code of Conduct, 29/07/2015: tata.com] • Not met: Age verification of job applicants and workers Score 2 <ul style="list-style-type: none"> • Not met: Remediation if children identified
D.5.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: The Company states that 'The Suppliers shall not employ children at their workplaces'. No further evidence found, including age verification requirements and specific remediation programmes in case child labour is found. [Tata Motors Supplier Code of Conduct, 27/09/2016: tatamotors.com] • Not met: How working with suppliers on child labour Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Provide analysis of trends demonstrating progress
D.5.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Pays workers in full and on time: The Company states that 'Employee wages are paid in accordance with wage agreements that have varying terms (typically three to five years) at different locations.' However, no evidence regarding the regular, full and on time payments was found. [Integrated annual Report 2019-20, 2020: tatamotors.com] • Not met: Payslips show any legitimate deductions <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters
D.5.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Debt and fees rules in codes or contracts • Not met: How working with suppliers on debt & fees <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.5.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not retain documents or restrict movement: The Company states that 'We do not confiscate personal documents of our employees, or force them to make any payment to us or to anyone else in order to secure employment with us, or to work with us.' [Tata Code of Conduct, 29/07/2015: tata.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How sure about agencies or brokers
D.5.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Free movement rules in codes or contracts • Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made
D.5.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company states that '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 as per the 'Conflicts of Interest' clause of this Code and in accordance with applicable company policies and law.' However, no evidence found regarding a commitment to not interfere and to prohibit discrimination against union members or representatives. [Tata Code of Conduct, 29/07/2015: tata.com] • Not met: Discloses % covered by collective bargaining <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
D.5.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: FoA & CB rules in codes or contracts • Not met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Injury Rate disclosures: The Company states that Total recordable cases frequency rate in 2019 was 0.39. [Integrated annual Report 2019-20, 2020: tatamotors.com] • Met: Lost days or near miss disclosure: The Company states that its Lost time injury frequency rate including fatalities was 0.09. [Integrated annual Report 2019-20, 2020: tatamotors.com] • Met: Fatalities disclosures: The Company states that zero fatalities occurred. [Integrated annual Report 2019-20, 2020: tatamotors.com] Score 2 <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company states: 'With continuation of Safety Excellence Journey at the Company, the Organisation has achieved Fatality Free Year 2019-20' [...] Various proactive initiatives taken by the organisation which involves proactive monitoring of Leading indicators (also known as Proactive Safety Index), introduction of focused training sessions on Risk Perception and Behaviour Based Safety & I-care, for Shop floor employees. Also, special focus was given on Driving and Road Safety. Training and Capability Building across organisation continued to be considered as a key element of Safety Processes for all Employees, Contractors and Vendors. The organisation achieved 6.3 Training manhours (up by 31%) per employee and 8.1 Training man-hours (up by 41%) per Contractor employee in 2019-20 for 7 Manufacturing Plants.' [Integrated annual Report 2019-20, 2020: tatamotors.com] • Not met: Met targets or explains why not
D.5.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Sets out clear Health and Safety requirements • Not met: Injury rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosures Score 2 <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provide analysis of trends in progress made
D.5.8.a	Women's rights (in own production or manufacturing operations)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Process to stop harassment and violence: The Company states that 'The Company has zero tolerance for sexual harassment at workplace and has adopted a Policy on Prevention, Prohibition and Redressal of sexual harassment at workplace in line with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules thereunder. Internal Complaints Committee ('ICC') is in place for all works and offices of the Company to redress complaints received regarding sexual harassment'. [Integrated annual Report 2019-20, 2020: tatamotors.com] • Not met: Working conditions take account of gender • Not met: Equality of opportunity at all levels Score 2 <ul style="list-style-type: none"> • Not met: Meets all of the requirements under score 1
D.5.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Provide analysis of trends in progress made
D.5.9.a	Working hours (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Respects max hours, min breaks and rest periods in its own operations Score 2 <ul style="list-style-type: none"> • Not met: How it implements and checks this
D.5.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Working hours in codes or contracts • Not met: How working with suppliers on working hours Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company indicates it expects its suppliers: 'To ensure its commitment to support the objectives of the Dodd-Frank Act and other similar laws, TML requires its suppliers to comply with the Conflict Minerals reporting requirements and to engage in due diligence of their supply chains in accordance with an internationally recognized framework, such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition 2016. TML requires its suppliers to state whether the parts supplied to TML consist of 3TG Minerals (defined to include cassiterite, columbite - tantalite, gold, wolframite and their derivatives (tin, tantalum, tungsten and gold)) and to report the source of the 3TG Minerals included in their parts supplied to TML'. However, it is not clear if these requirements are included into commercial contracts/written agreements with suppliers. No further evidence found. [2019 SD Form, 29/05/2020: tatamotors.com] • Not met: Works with smelters/refiners and suppliers to build capacity: The Company states that 'TML continues to educate its supplier base regarding the Conflict Minerals disclosure requirements through online portals (Supplier Relationship Management, Achilles Automotive and i-point), vendor council meetings and communications by senior procurement executives.' However, no evidence regarding the education of smelters/refiners was found. No further evidence found in the latest revision. [2019 SD Form, 29/05/2020: tatamotors.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Contractual requirement to disclosure smelter/refiner information: The Company states that 'TML does not directly purchase ore or unrefined 3TG Minerals from mines, and the mines producing minerals and the smelters who can provide relevant information regarding the source of 3TG Minerals are several tiers down in the supply chain from its direct suppliers. As a result, TML relies on its suppliers to provide information on the origin of the 3TG Minerals contained in components and materials supplied to TML, including with respect to sources of 3TG Minerals that are supplied initially to TML's suppliers by sub-tier suppliers'. However, no further evidence found that it incorporates into commercial contracts/written agreements with suppliers requirements to disclose to the Company updated smelter/refiner information for any 3TG mineral used in the production of its parts, materials, components and products. No further evidence found. [2019-20 CSR Report, 06/2020: tatamotors.com] • Not met: Contractual requirement covers all minerals
D.5.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Risk identification and disclosure in line with OECD Guidance: The Company states that 'TML aims to structure its due diligence processes in accordance with the OECD Due Diligence Guidance, which sets forth the following five steps for establishing a responsible supply chain: (i) establishing strong company management systems, (ii) identifying and assessing risks in the supply chain, (iii) designing and implementing a strategy to respond to identified risks [...]. We have reviewed in-scope supplier CMRTs for: Completion of all required reporting elements; Consistency between the expected 3TG Minerals reported as being intentionally added to the supplier's products and the Minerals reported in IMDS; Presence of a smelter list that includes expected metals based on IMDS reporting'. Also, 'To ensure accountability, TML already has strong company management systems in place to identify and assess risks in the supply chain [...]. TML has identified certain risks and plans to design and implement appropriate strategies in an effort to mitigate risks in its supply chain'. However, no further details found, including risks identified. [2019 SD Form, 29/05/2020: tatamotors.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Identification of smelter/refiners and OECD Guidance: The Company indicates: 'TML continues to engage in extensive liaising with its direct suppliers to acquire more specific information regarding the smelters, miners and refineries and to fulfill its commitment to the CMCP. TML intends to determine and disclose the relevant specific information once more accurate and complete data is available from its suppliers. For the above purpose, TML intends to continue to extend efforts towards developing and implementing its CMCP and working with suppliers in examining their supply chains for purposes of tracing the country of origin and chain of custody of the 3TG Minerals used in the manufacturing or production of its products'. However, no further evidence found of its processes to assess whether the smelters/ refiners have carried out due diligence processes in accordance with the OECD Guidance with respect to at least 3TG. [2019 SD Form, 29/05/2020: tatamotors.com] Score 2 <ul style="list-style-type: none"> • Not met: Discloses smelters/refiners judged in line with OECD Guidance • Not met: Risk identification and disclosure covers all minerals
D.5.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes mineral risk management plan for supply chain: The Company states that 'TML aims to structure its due diligence processes in accordance with the OECD Due Diligence Guidance, which sets forth the following five steps for establishing a responsible supply chain: (i) establishing strong company management systems, (ii) identifying and assessing risks in the supply chain, (iii) designing and implementing a strategy to respond to identified risks [...] To ensure accountability, TML already has strong company management systems in place to identify and assess risks in the supply chain [...] TML has identified certain risks and plans to design and implement appropriate strategies in an effort to mitigate risks in its supply chain. To ensure such risk mitigation, TML is continually communicating and following up with direct suppliers, who have not submitted their responses or submitted insufficient declarations, through online portals, vendor council meetings and direct communications by TML's senior procurement executives'. However, specific details regarding risk management were not found. No further evidence found in the latest revision. [2019 SD Form, 29/05/2020: tatamotors.com] Score 2 <ul style="list-style-type: none"> • Not met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not met: Disclose better risk prevention/mitigation over time • Not met: Suppliers and stakeholders engaged in risk management strategy • Not met: Risk management and response processes cover all minerals
D.5.11	Responsible Materials Sourcing	[SD.5.10]	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Due diligence for raw materials in supplier code/contracts • Not met: Works with suppliers to build capacity in risk assessment and due diligence Score 2 <ul style="list-style-type: none"> • Not met: Meets all requirements under score 1 • Not met: Identify the sources of high-risk raw materials in its supply chain

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 9.37 out of 80 points scored in themes A-D & F has been applied to produce a score of 2.34 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1 out of 4	Out of a total of 60 indicators assessed under sections A-D of the benchmark, Tata Motors made data public that met one or more elements of the methodology in 15 cases, leading to a disclosure score of 1 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company structures its annual report following GRI standards, as it is stated in the Company's GRI Standard disclosure. [GRI Standard Disclosure FY 2019/20, 2020: tatamotors.com]

Indicator Code	Indicator name	Score	Explanation
F.3	Key, High Quality Disclosures	0 out of 4	<p>Tata Motors met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.5.1.a: Living wage (in own production or manufacturing operations) • Not met: Score 2 for D.5.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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