



# Independent Assurance Statement

## Introduction

DNV Business Assurance India Private Limited ('DNV'), has been commissioned by Tata Communications Limited ('Tata Communications' or 'the Company', Corporate Identity Number: (L64200MH1986PLC039266) to undertake an independent assurance of the Company's Sustainable Development Report 2022-23 both in online and Pdf format ('the Report') for the financial year ending 31st March 2023. The sustainability disclosures in this Report have been prepared by Tata Communications based on the material topics identified by them and in reference with the Global Reporting Initiative (GRI) Sustainability Reporting Standards 2021 ('GRI Standards'). The intended user of this assurance statement is the Management of Tata Communications ('the Management'). Our assurance engagement was planned and carried out during March 2023 - September 2023.

## Responsibilities of the Management of Tata Communications Limited and of the Assurance Provider

The Management of the Company has the sole responsibility for the preparation of the Report and are responsible for all information disclosed in the Report as well as the processes for collecting, analyzing and reporting the information presented in the Report. Tata Communications is also responsible for ensuring the maintenance and integrity of its website and any referenced disclosures on sustainability performance. In performing this assurance work, DNV's responsibility is to the Management of the Company; however, this statement represents our independent opinion and is intended to inform the outcome of the assurance to the stakeholders of Tata Communications.

We provide a range of other services to the Company, none of which in our opinion, constitute a conflict of interest with this assurance work. Our assurance engagements are based on the assumption that the data and information provided by the Company to us as part of our review have been provided in good faith and are free from misstatements.

## Scope, Boundary and Limitations

The reporting scope and boundary encompasses environmental, social and governance performance of Tata Communications' global operations as brought out in the section 'About the Report' of the report for the activities undertaken by the Company during the financial year 1st April 2022 - 31st March 2023.

We performed a limited level of assurance based on our assurance methodology VeriSustainTM1. The assurance engagement considers an uncertainty of 35% based on materiality threshold for estimation/measurement errors and omissions. We did not engage with any external stakeholders as part of this assurance engagement.

During the assurance process, we did not come across limitations to the scope of the agreed assurance engagement. The reported data on economic performance, expenditure towards Corporate Social Responsibility (CSR) activities, and other financial data are based on audited financial statements issued by the Company's statutory auditors which is subject to a separate audit process. We were not involved in the review of financial information within the Report.

## Basis of our Opinion

As part of the assurance process, a multi-disciplinary team of sustainability specialists performed assurance work for selected sample sites of Tata Communications. We adopted a risk-based approach, that is, we concentrated our assurance efforts on the issues of high material relevance to the Company's business and its key stakeholders. We carried out the following activities:

- Reviewed the approach to stakeholder engagement and materiality determination process and its outcomes as brought out in the Report.
- Interviews with selected senior managers responsible for management of sustainability issues and review of selected evidence to support topics disclosed in the Report. We were free to choose interviewees and interviewed those with overall responsibility to deliver the Company's sustainability objectives.

<sup>1</sup> The VeriSustain protocol is based on the principles of various assurance standards including International Standard on Assurance Engagements 3000 (ISAE 3000) Revised (Assurance Engagements other than Audits or Reviews of Historical Financial Information) and the GRI Principles for Defining Report Content and Quality, international best practices in verification and our professional experience; and is available on request from [www.dnv.com](http://www.dnv.com)

- Sample based assessment of site-level sustainability performance data through on-site audits at GK-1 Delhi, VSB Chennai and Dighi Pune to review processes and systems for preparing the data and implementation of sustainability strategy. We were free to choose sites for conducting our assessment.
  - Reviewed the process of reporting on Organizational Profile, Strategy, Ethics and Integrity, Governance, Stakeholder Engagement and Reporting Practices based on GRI 2: General Disclosures 2021.
  - Reviewed the performance disclosure of identified material topics and related GRI Standards; that is, carried out an assessment of the processes for gathering and consolidating performance data related to identified material topics and, for a sample, checked the processes of data consolidation to assess the Reliability and Accuracy of performance disclosures reported based on GRI's topic-specific Standards.
  - Verification of the data consolidation of reported performance disclosures in context to the Principle of Completeness as per VeriSustain for a limited level of verification.
- GRI 306: Waste 2020 – 306-1, 306-2; 306-3; 306-4; 306-5
  - GRI 308: Supplier Environmental Assessment 2016 – 308-1
  - GRI 401: Employment 2016 – 401-1; 401-2; 401-3
  - GRI 402: Labor/Management Relations 2016 – 402-1
  - GRI 403: Occupational Health and Safety 2018 – 403-1, 403-2; 403-4; 403-5; 403-6; 403-7; 403-8; 403-9; 403-10
  - GRI 404: Training and Education 2016 – 404-1; 404-2; 404-3
  - GRI 405: Diversity and Equal Opportunity 2016 – 405-1; 405-2
  - GRI 406: Non-discrimination 2016 – 406-1;
  - GRI 407: Freedom of Association and Collective Bargaining 2016 – 407-1
  - GRI 408: Child Labor 2016 – 408-1
  - GRI 409: Forced or Compulsory Labor 2016 – 409-1
  - GRI 410: Security Practices 2016 – 410-1
  - GRI 414: Supplier Social Assessment 2016 – 414-1
  - GRI 418: Customer Privacy 2016 – 418-1

## Opinion

On the basis of the verification undertaken, nothing has come to our attention to suggest that the Report does not properly adhere to the GRI Standards 2021, including GRI 2: General Disclosures 2021, GRI 3-3: Management of Material topics and disclosures related to the following GRI Standards which have been chosen by Tata Communications to bring out its performance against a set of identified material topics:

- GRI 201: Economic performance 2016 – 201-1; 201-2; 201-3; 201-4
- GRI 202: Market Presence 2016 – 202-1; 202-2
- GRI 203: Indirect economic impact 2016 – 203-1; 203-2
- GRI 204: Procurement Practices 2016 – 204-1
- GRI 205: Anti-corruption 2016 – 205-1; 205-2; 205-3
- GRI 206: Anti-competitive Behavior 2016 – 206-1
- GRI 302: Energy 2016 – 302-1; 302-3; 302-4;
- GRI 303: Water and Effluents 2018 – 303-1, 303-2; 303-3; 303-4; 303-5
- GRI 305: Emissions 2016 – 305-1, 305-2, 305-3 (Partial disclosure)2, 305-4, 305-5; 305-6

## Observations

Without affecting our assurance opinion, we provide the following observations against the principles of VeriSustain:

### Materiality

*The process of determining the issues that is most relevant to an organization and its stakeholders.*

The Report explains out the materiality assessment process carried out by the Company which has considered concerns of internal and external stakeholders, and inputs from peers and the industry, as well as issues of relevance in terms of impact for Tata Communication's business. The list of topics have been prioritized, reviewed and validated, and The Company has indicated that there is no significant change in material topics from the previous reporting period.

**Nothing has come to our attention to suggest that the Report does not meet the requirements related to the Principle of Materiality.**

## Stakeholder Inclusiveness

*The participation of stakeholders in developing and achieving an accountable and strategic response to Sustainability.*

The Report brings out the stakeholders who have been identified as significant to Tata Communications, as well as the modes of engagement established by the Company to interact with these stakeholder groups. The key topics of concern and needs of each stakeholder group which have been identified through these channels of engagement are further brought out in the Report.

**Nothing has come to our attention to suggest that the Report does not meet the requirements related to the Principle of Stakeholder Inclusiveness.**

## Responsiveness

*The extent to which an organization responds to stakeholder issues.*

The Report articulates the Company's responses to the stakeholder engagement processes carried out by the Company, as well as the approaches and performance related to identified material topics through GRI topic-specific Standards. The Company has further linked its material topics to its overall strategies, management approach and goal setting processes, as well as future challenges of the healthcare business.

**Nothing has come to our attention to believe that the Report does not meet the requirements related to the Principle of Responsiveness.**

## Reliability

*The accuracy and comparability of information presented in the report, as well as the quality of underlying data management systems.*

The Report brings out the systems and processes that the Company has set in place to capture and report its performance related to identified material topics across its reporting boundary. The majority of data and information verified during assessment with Tata Communications management teams and data owners at the sampled sites within the boundary of the Report were found to be fairly accurate and reliable. Some of the data inaccuracies identified during the verification process were found

to be attributable to transcription, interpretation and aggregation errors. These data inaccuracies have been communicated for correction and the related disclosures were reviewed post correction.

**Nothing has come to our attention to believe that the Report does not meet the principle of Reliability and Accuracy.**

## Completeness

*How much of all the information that has been identified as material to the organisation and its stakeholders is reported?*

The Report brings out the Company's performance, strategies and approaches related to the environmental, social and governance issues that it has identified as material for its operational locations coming under the boundary of the report, for the chosen reporting period while applying and considering the requirements of the GRI's Principle of Completeness.

**Nothing has come to our attention to suggest that the Report does not meet the Principle of Completeness with respect to scope, boundary and time.**

## Neutrality

*The extent to which a report provides a balanced account of an organization's performance, delivered in a neutral tone.*

The Report brings out the disclosures related to Tata Communication's performance during the reporting period in a neutral tone in terms of content and presentation, while considering the overall macroeconomic and industry environment.

**Nothing has come to our attention to suggest that the Report does not meet the requirements related to the Principle of Neutrality.**

## Statement of Competence and Independence

DNV applies its own management standards and compliance policies for quality control, in accordance with ISO IEC 17021:2015 - Conformity Assessment Requirements

<sup>2</sup> Tata Comm has disclosed Scope 3 emissions under the following categories: capital and purchased goods, business travel, employee commute, wastewater treated in municipal facilities and waste recycled, and solid waste disposal through municipal facilities; downstream transportation, purchased fuel, transmission & distribution losses, and upstream leased assets.

for bodies providing audit and certification of management systems, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We have complied with the DNV Code of Conduct<sup>2</sup> during the assurance engagement and maintain independence as required by relevant ethical requirements relevant ethical requirements including the ISAE 3000 (Revised) Code of Ethics. This engagement work was carried out by an independent team of sustainability assurance professionals. DNV was not involved in the preparation of any statements or data included in the Report except for this Assurance Statement and Management Report. DNV maintains complete impartiality toward stakeholders interviewed during the assurance process.

For DNV Business Assurance India Private Limited

<p><b>Karthik Ramaswamy</b></p> <p>Digitally signed by Karthik Ramaswamy Date: 2023.09.06 17:13:03 +05'30'</p> <p>Karthik Ramaswamy Lead Verifier, Sustainability Services, DNV Assurance India Private Limited, India</p>	<p><b>Sharma, Anjana</b></p> <p>Digitally signed by Sharma, Anjana Date: 2023.09.08 14:37:43 +05'30'</p> <p>Anjana Sharma Head – Regional Sustainability Operations, DNV Business Assurance India Private Limited, India</p>	<p><b>Kakaraparthi, Venkata Raman</b></p> <p>Digitally signed by Kakaraparthi, Venkata Raman Date: 2023.09.08 19:57:28 +05'30'</p> <p>Kakaraparthi Venkata Raman Assurance Reviewer, Sustainability Services DNV Business Assurance India Private Limited, India</p>
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05 September 2023, Mumbai, India.

DNV Business Assurance India Private Limited is part of DNV – Business Assurance, a global provider of certification, verification, assessment and training services, helping customers to build sustainable business performance. [www.dnv.com](http://www.dnv.com)

<sup>2</sup> The DNV Code of Conduct is available on request from [www.dnv.com](http://www.dnv.com) (<https://www.dnv.com/about/in-brief/corporate-governance.html>)

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