

Our Commitment to UN Global Compact "Communication on Progress"

June 2009/November,2009

TATA INTERNATIONAL LIMITED

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Communication on Progress

Introduction

Tata International Limited has been a signatory to the United Nations Global Compact since 2002. We are committed to the ten principles of the Compact which foster better corporate responsibility in the areas of human rights, labour, environment and anti-corruption. This Communication on Progress provides an insight into our recent activities in support of the Global Compact's objectives.

Statement of Continued Support

As a member of the Tata group we follow the principles of corporate governance and a code of ethics (called the Tata Code of Conduct) very similar to the Global Compact. This code of conduct is signed by all our officers and has been shared with our suppliers and customers.

The triple bottom line – economic, environmental and social - is today a prerequisite with stakeholders across the globe. Fortunately, Tata International, being a part of the Tata Group, whose values since the 1860s have mandated that no achievement in financial terms is worthwhile unless it improves the quality of life of the people and meets national aspirations, have always believed in it.

In order to meet the national objective of earning foreign exchange, Tata International was incorporated as a trading house in 1962. Today, as an international marketing company dealing in engineering products and leather it serves this same purpose in countries as wide apart as Vietnam and Zambia, by contributing to their foreign exchange earnings. Similarly, in response to a government request to develop the then backward areas of the country our leather manufacturing facility was set up in Dewas, in Madhya Pradesh, today it is the global hub for our leather business, and Tata International is India's largest exporter of leather and leather products.

We are pleased that we continue to receive encouraging external feedback on our environment initiatives at our leather manufacturing facility at Dewas which was recognized by the Ministry of Environment & Forest, Government of India with the 'National Award for Prevention of Pollution' and the 'Rajiv Gandhi Environmental Award for Clean Technology', by the Council of Leather Exports for being the first leather manufacturing facility in India to have ISO 14001 certification, and by TERI with Corporate Environmental Award. At the leather factory in Dewas our patented technology for gainful utilization of solid waste through biomethanation and our research and development efforts for chrome-free leathers are world class. The Leather Complex at Dewas has been awarded Eco-Labelling License by the Bureau of Indian Standards (BIS)

The Corporate Social Responsibility (CSR) (now termed as Corporate Sustainability - CS) programs we undertake address the Human Development Goals and we measure our CSR process using the Tata Index for Sustainable Human Development, which has been developed by the Tata Council for Community Initiatives, Tata Quality Management Services and the UNDP. We are also signatories to the India Business Alliance to Stop TB catalyzed by the Global Health Initiative of the World Economic Forum. We have undertaken an initiative in 2006 to create women self help groups in the Kancheepuram district who will cater to our leather products factories. During 2007, we as a part of the TATA Group initiative have supported Affirmative Action to support the economically disadvantaged sections of society. During 2007 we have commenced a new initiative for training economically disadvantaged women from Dewas village (near our Leather Manufacturing Unit) in the footwear manufacturing skills and also provided then employment opportunities in our Ladies Footwear Plant.Today we have over 1000 women working in our state of the art ladies footwear plant. Some promising women have been sponsored by the Company for higher learning and training at Taiwan during April/May,2009. During September,2009 the Company has set up an internal team to prepare for becoming SA 8000 compliant and submit for external assessment by year end.

Our strategy recognizes sustainable development as a means for achieving long term growth, while keeping in mind that we hold our business in trust for our stakeholders and this planet in trust for future generations. We also recognize that we still have a long way to go and I invite any individual or organization to share their views with us. So that, in so doing we can learn from each other.

Mr.O K Kaul Executive Director



UN Global Compact – "Communication on Progress"

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Principles (GRI indicators correlated with)	Company's Policy & Direction (Approach / Process / Deployment)	Specific actions taken during the current financial year (Outcomes with Key Results & Measurements)	
Human Rights			
Principle 1 Businesses should support and respect the protection of internationally proclaimed human rights (HR 1,2,3,4)	We follow the International Declaration of Human Rights. Our HR policies and procedures reflect, pursue and review these on an annual basis.	 Employee concerns are aired and reviewed regularly through Dialogues (Communication Meetings) at all the Company locations conducted on separate occasions throughout the year by 1) the Executive Director 2) the HR Head 3) Senior Managers with the Business Head / Location Head present. At our manufacturing facility at Dewas in Madhya Pradesh we adhere to working hours as laid down in the Factory Rules 1962. Ascertain that all our units as well as Supply Chain Units and the personnel employed through contractors do not employ child labour. To reinforce the 'Tata Code of Conduct' a printed version is shared in English,Hindi and Tamil (for the benefit of workforce in Dewas and Chennai who are Hindi and Tamil speaking) with all our employees, including workers, and suppliers. 	
Principle 2 Make sure they are not complicit in human rights abuses (HR 2, 3)	Our HR / IR processes by way of consultative committees are at all times constantly and proactively addressing issues in possible areas of conflict with the Unions.	 Care is taken by the Company to ensure that it does business with suppliers, contractors and service providers who comply with the relevant standards under the Universal Declaration and the Fundamental Human Rights Conventions of the ILO and also meet the statutory requirements like registration for Provident Fund for its personnel and refraining from using child labour. The Joint Management Council formed in 2004 comprising of members from the Management and the Union, meets regularly and addresses the areas of conflict. Management walks the talk. Besides, there is the Safety Committee. Safety related data and action plan is submitted separately. 	



Labour Standards

 Principle 3 Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining & 4 The elimination of all forms of forced and compulsory labour (HR 5, 7 LA 3, 4) 	 As stipulated in the various Laws in India and as per our company policy we have a process of 'collective bargaining' through employee Unions and periodic negotiations are in place since the inception of the company. Forced and compulsory labour is banned by the Government of India. 	 The Company's Senior Management interacts with the collective bargaining group (workers / staff / associates) in this regard. Every 3 years a Wage Negotiation takes place wherein the demands of the workers are discussed, bargained and concluded in the form of an Agreement. The Agreement addresses issues of employee welfare and well being. The Company has not experienced industrial unrest since its inception. During 2007, a revised wage agreement was signed. There is no forced and compulsory labour in Tata International Limited.
Principle 5 The effective abolition of child labour (HR 6)	All suppliers are told that the Company shall take serious note if the contactor in any way employs child labour, directly or indirectly.	 The Company's Recruitment Policy ensures that only adults over 18 years of age are employed by the Company. The Company checks that its suppliers, supply chain unit, service providers and contractors also employ adults over 18 years of age and do not resort to child labour in their operations. The monitoring is by way of periodic review of suppliers/ contractors. We have conveyed to all suppliers the seriousness of the issue.
Principle 6 Eliminate discrimination in respect of employment and occupation (HR 4, LA 10,11)	The company's policy on selection, recruitment and confirmation of employment includes an explicit understanding that we are equal opportunity employers as per the Tata Code of Conduct (Clause 4). With respect to disability, the incumbent shall get the job if she or he fulfils the basic requirements.	 The Company has a systematic recruitment process, which ensures that there is no discrimination on account of age, sex, nationality or religion. The Company is an equal opportunity employer. The Company gives employment or contract work opportunities to physically challenged people wherever possible, including the grading of leather by the visually challenged and housekeeping by the physically challenged. The Company practices Affirmative Action



Principle 7 Businesses should The company is traditionally pro-environment and specific

Environmental Protection

Principle 7	The company is traditionally	Precautionary approaches to environmental challenges -
Businesses should	pro-environment and specific	Towards Sustainable Development
support a	policies and guidelines exist	Environmental Impact Assessment study
precautionary	to set direction that	ISO-14001 Unit
approach to	addresses these Principles	Eco-labelling of leather and leather products
environmental	and beyond. The company	(Eco Mark for Finished Leather products)
challenges	has an Environmental Policy.	Recycling of solid and liquid wastes
0		 Waste reduction approaches at source.
(HR 3.13)	Environment related data	Rain water harvesting.
(/	and target parameters are	Stop use of banned items
Principle 8	enclosed separately	 Technical support to suppliers not to use banned chemicals
Undertake		 Maintaining norms of treated effluent water
initiatives to		Recycling of Effluent Treatment Plant treated water using
promote greater		Reverse Osmosis technology
environmental		 Patenting of new R&D technologies
responsibility		 Biomethanation of different solid wastes
responsibility		 Biotech mode of leather manufacturing
$(\Gamma N + 1 + 2 + 1 G)$		 Cost reduction by substitution of cheaper and eco-friendly
(EN. 1 to 16)		chemicals.
		chemicals.
& 9		Initiatives to promote greater environmental responsibility
Encourage the		 Recycling of waste water
development and		 Recycling of all type of solid wastes/ hazardous waste
diffusion of		
environmentally		 Biotechnology for leather manufacturing.
friendly		 Microbes produced colour.
technologies		 Energy generation form solid wastes and resource
		recovery from hazardous waste
(EN-17 for		 Ground and Roof water harvesting
Principle 9)		 Greenery by design. More than 250,000 trees planted
• •		all around the complex.
		 Utilization of solar energy for boiler feed water
		 Biogas from leather waste (project funded jointly by the
		Company and UNDP/Ministry of non-conventional
		energy sources, Government of India.
		Development and diffusion of environment friendly
		technologies
		 Eco-friendly chrome leather
		 Formaldehyde free leather
		 Leather totally free from PCP and Azo dyes
		1. The company has initiated various environmental care
		programmes including recycling of energy, water and
		hazardous waste under the umbrella of ISO-14001 &
		Eco-labelling of our products.
		2. The leather manufacturing unit at Dewas in Madhya
		Pradesh, India has won many prestigious awards like
		Rajiv Gandhi award for best environmental practices,
		TERI Corporate Environmental award for
		Environmental excellence. State level environmental
		award from the Govt. of Madhya Pradesh, etc.
		3. These environmental care efforts help in GHG emission
		reduction.



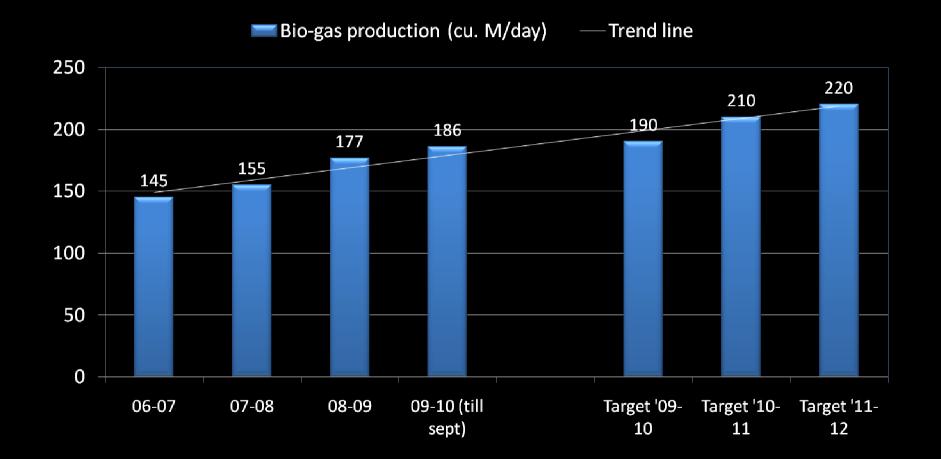
Anti-Corruption and prevention of Bribery

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Principle 10 Businesses should work against corruption in all its forms, including extortion and bribery	As a Tata company there is an elaborate system and process for the 'management of business ethics'. The company has the head of the Company as the Principal Ethics Officer, a Senior Manager as the Chief Ethics Counsellor and each Location has an Ethics Counsellor responsible. There is a Lady Ethics Counsellor to cater to the sensitivities of women employees. All employees sign the Tata Code of Conduct. The Tata Code of Conduct is sent to all suppliers with the contract, for their perusal in respect of relevant clauses. Clauses 5, 6 and 7 address these issues. The Tata Code of Conduct is also adhered to by the Company's 'wholly-owned subsidiaries in Hong Kong, UAE and South Africa	 Every employee has to sign the Tata Code of Conduct (TCOC). Every year, every new employee signs the Tata Code of Conduct. Hotline: a dedicated e-mail id has been in use since 2005 to ease the reportage of ethical concerns by employees and suppliers and partners. Awareness Programmes on TCOC are conducted regularly across the Organisation.

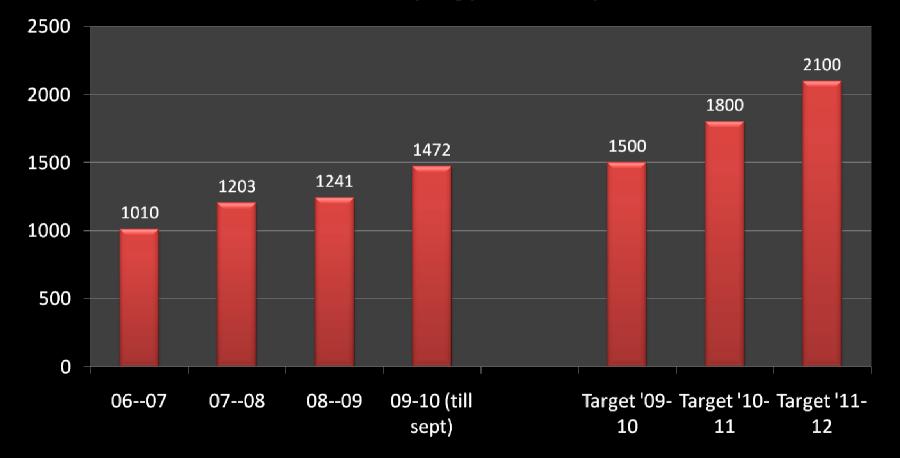


Turning Waste into Energy: TIL's Technology for Environment



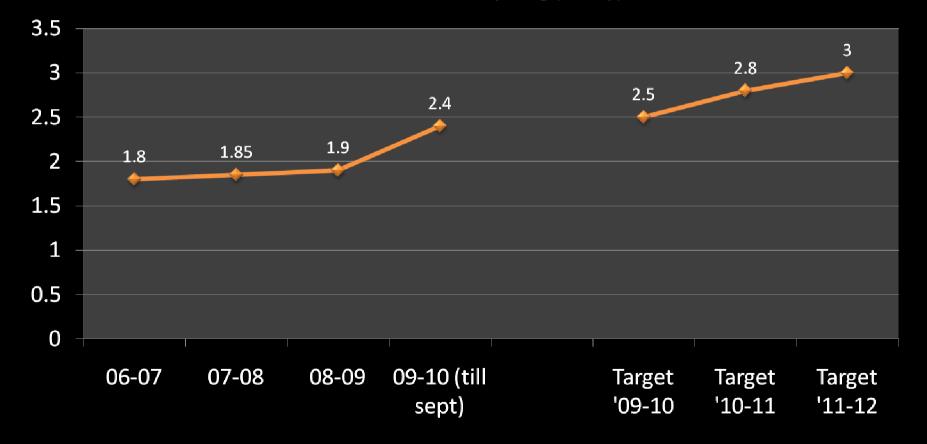
Saving Environment: Process Water Recycling

Water Recycling (cu. M/Month)



Solid Waste Recycling

Solid Waste Recycling (T/day)





EHS & Social Environment – Output Slide

2008-09	Measure	2009-10 (Upto Oct. 2009)		
		Target	Estimate	Variance(%)
614	No of Employees imparted Training on Health & Safety	400	195	
30	No of Accidents	0	7	0

•What Went Well

- 1. No. of accident and man days lost could be controlled.
- 2. "World Environment Day" was celebrated on 5th June, 2009 and poster competition was organized.
- 3. Safety Audit conducted by an external agency. The action plan for the observations/recommendations made is being worked out.
- 4. Total 4 Safety shower cum eye wash fountain have been installed
- 5. Fire Fighting Training and Demonstration Program was conducted on 4th March 4th June and 10th July 2009,

TATA INTERNATIONAL

- 'Art of Living' program was conducted on 19th July to 24th July and 9th Sept. to 13th Sept. 2009.
- 7. Medical Health Check-up of 284 permanent employees done in first half.
- 8. Health awareness (**Aids**) programme was organized for employees of Ladies Footwear Plant.
- 9. Safety Committee meetings are being held regularly and monitored.
- Smoking is strictly prohibited in the Factory premises in compliance to Govt. Notification No. P. 16015/20/2007-PH dated 30th May2008. During last 1 year 29 permanent and 13 contractual employees have been penalized for Smoking.
- 11. Safety, health awareness, and Fire Fighting training imparted to 195 permanent employees and 85 employees of service providers
- 12. Seven Buses and twelve Cars have been equipped with Fire Extinguishers (Cap.1 Kg. & 500 Gms) and First Aid Boxes.
- 13. We have installed eight Emergency Siren in different locations.





What went Wrong

- 1. Accident numbers reached to 30.
- 2. Man days lost 489
- 3. Only 14 health & safety awareness programme could be conducted.

Learning For 2009-2010

- 1. More focus to be given on accident analysis
- 2. Intensive training to be given for material handling.
- 3. Intensive health & safety awareness programme to be organized.