



**TATA** AUTOCOMP



# ESG FACTBOOK

FY 2024-25



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## About this ESG Factbook

This ESG Factbook, hereafter referred to as “**Factbook**”, provides a comprehensive overview of Tata AutoComp Systems Limited (Standalone), hereafter referred to as “**Tata AutoComp**” or “**we**” or “**us**” or “**Company**”. It highlights key aspects of our environmental, social, and governance (ESG) performance, providing stakeholders with a clear and concise snapshot of our initiatives and achievements. For a more detailed insight into our holistic strategy and overall progress, we encourage readers to refer to the Sustainability Report for FY 2024-25 [here](#).

**The disclosures presented in this Factbook pertain to the reporting period of FY 2024-25, which is April 01, 2024, to March 31, 2025.**

# Company Information

## Reporting Period

The reporting period for this report is from April 01, 2024, to March 31, 2025. Through this Factbook, we disclose our non-financial performance that covers our governance, environmental, and social responsibilities.

## Scope and Boundary

This ESG Factbook covers the operational boundaries of Tata AutoComp Systems Limited (Standalone), which includes the following Business Divisions and our Group Office.

- Tata AutoComp Interior & Plastic Division (IPD)
- Tata AutoComp Composites Division (CD)
- Tata AutoComp Gotion Division (Gotion)
- Tata AutoComp Supply Chain Solution (TSS)
- Tata AutoComp Technical Centre (TTC)
- Independent Aftermarkets (IAM)
- Group Office (GO)

## Independent Assurance

The Greenhouse Gas (GHG) emissions inventory data for FY 2024-25 is in the process of being independently assured by a third-party with Limited Assurance. We are drawing from the verified portions of the GHG data to provide stakeholders with consistent, reliable, and credible information, with the formal assurance statement to be issued upon completion.

The Safety indicators (fatalities and LTIFR) have been independently assured by Safezone Engineering Services, by an approved Safety Auditor by the Directorate of Industrial Safety and Health (DISH), Government of Maharashtra.

## Company Information

To accurately measure our sustainability performance and track our progress in decoupling business growth from our environmental footprint, we use key denominators to calculate intensity metrics.

### Key company information including Revenue

Company Data	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Revenues	INR	29,121,115,610	56,829,517,850	54,459,409,000	39,588,646,000
Revenues	USD	383,626,868.79	691,524,919.08	681,572,533.58	456,457,973.02
Total Employees*	Number	5,512	6,154	6,716	7,437

\*The total employees for Tata AutoComp Systems Limited (TACO) is calculated as per this formula, i.e., Total employees = Permanent employees + Contractual employees

# 1. Governance and Economic Dimension

## 1.1. Transparency & Reporting

### 1.1.1. Sustainability Reporting Boundaries

The FY 2024-25 Sustainability Report and this ESG Factbook covers Tata AutoComp Systems Limited's (Standalone) ESG performance from April 01, 2024, to March 31, 2025, for the following divisions:

- Tata AutoComp Systems Interiors & Plastic Division (IPD)
- Tata AutoComp Gotion Division (Gotion)
- Tata AutoComp Systems Composites Division (CD)
- Tata AutoComp Systems Supply Chain Solutions (TSS)
- Tata AutoComp Systems Technical Centre (TTC)
- Independent Aftermarket (IAM)
- Group Office (GO)

*Tata AutoComp's sustainability disclosures fully cover its standalone operations, representing 100% of the company's standalone revenue.*

*Read more in our Sustainability Report [here](#).*

*Read more in our Annual Report [here](#).*

### 1.1.2. Sustainability Reporting Assurance

Our sustainability report is not externally assured. However, we have undertaken an external assurance for both our GHG emissions and safety indicators.

External assurance obtained for:

- GHG emissions: We have engaged a third-party to deliver limited assurance on the GHG Inventory for FY 2024-25 and are in the process of receiving the final certificate.
- Safety indicators: Fatalities and LTIFR data for the past 4 financial years has been independently assured by Safezone Engineering Services by an approved Safety Auditor by the Directorate of Industrial Safety and Health (DISH), Government of Maharashtra.

### 1.1.3. Sustainability Taxonomies

Our sustainability reporting boundary for FY 2024-25 only includes operations within India and is therefore not subject to any of the sustainable taxonomies (EU, China, ASEAN, South Africa, Colombia, Japan or Korea) reporting requirements.

## 1.2. Corporate Governance

### 1.2.1. Board Independence

Our Terms and Conditions for the Appointment of Independent Directors (ID) are in accordance with India's Companies Act, 2013. Based on the Independence Statements

received from all the Independent Directors and in the opinion of the Board, the Independent Directors fulfil the independence requirements specified in the Companies Act, 2013.

These independence requirements include:

- The Director does not accept, nor does any family member accept, any payments from the Company or any parent or subsidiary of the Company in excess of the prescribed threshold during FY 2024-25, other than payments permitted under applicable rules.
- The Director has not been employed by the Company or any of its subsidiaries in an executive capacity within the last year.
- The Director is not a Family Member of an individual employed by the Company or any parent or subsidiary of the Company as an executive officer.
- The Director is not, and is not affiliated with, a Company, that is, an adviser or consultant to the Company or a member of the Company's senior management.
- The Director is not affiliated with a significant customer or supplier of the Company.
- The Director is not affiliated with a not-for-profit entity that receives significant contributions from the Company.
- The Director has not been a partner or employee of the Company's outside auditor during the past year.
- The Director does not have any other conflict of interest that would preclude them from being considered independent by the Board.

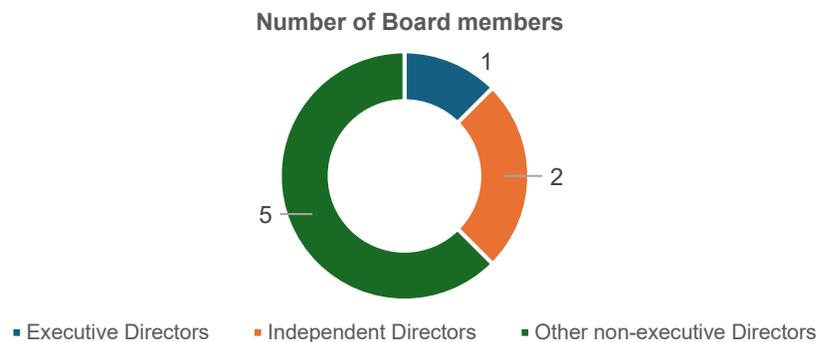
Since Tata AutoComp is an unlisted entity, as guided by the Companies Act, we have set a target to ensure that at least two of the Board of Directors should be Independent Directors.

### 1.2.2. Board Type

Our corporate governance is managed through a one-tier system of Board of Directors which comprises eight members. This structure provides a balanced mix of executive, independent, and non-executive expertise to ensure effective strategic oversight and accountability.

#### Board Composition – One-tier system

Particulars	Number of Members
Executive Directors	1
Independent Directors	2
Non-executive Directors	5
<b>Total Board Size</b>	<b>8</b>



As of March 31, 2025, 25% of our Board is comprised of Independent Directors. The Board also includes 2 women Independent Directors.

This composition ensures an optimum balance between Executive and Non-Executive Directors, enabling effective oversight and strategic guidance.

Read details about our Board of Directors [here](#).

*\*During FY 2024-25 the following changes took place in our Board*

- *Mr. Thierry Yves Henri Bollere was appointed as Non-Executive, Non- Independent Director w.e.f. January 02, 2025.*
- *Mr. Manoj Kolhatkar was appointed as Managing Director & CEO w.e.f. December 02, 2024.*
- *Mr. Hari Mundra ceased to be Non-Executive, Independent Director w.e.f. September 13, 2024 due to completion of her tenure as Independent Director.*
- *Ms. Rati Forbes ceased to be Non-Executive, Independent Women Director w.e.f. April 30, 2024 due to completion of her tenure as Independent Director. 58 \$Ms. Varsha Purandare was appointed as Non-Executive, Independent Director w.e.f. November 08, 2024.*

### **1.2.3. Non-Executive Chairperson/ Lead Director**

At Tata AutoComp, the role of Chief Executive Officer (CEO) and Chairperson is split, and Chairperson is non-executive but not independent. Mr. Manoj Kolhatkar serves as the Managing Director & CEO, while Mr. Thierry Yves Henri Bollere serves as our Non-Executive Chairman.

### **1.2.4. Board Diversity Policy**

Our “Policy to Promote Diversity on the Board of Directors” enables us to promote a more inclusive and well-rounded decision-making process. Having a diverse Board is crucial for us to ensure varied experiences, skills and backgrounds of individuals are brought to the table to enhance effectiveness.

Our Policy requires diversity factors are included in Board nomination process such as their age, gender, race, ethnicity, country of origin, nationality, cultural and geographical background, regional and industry experience, which will ensure that the Company retains its competitive advantage.

Refer to our Policy to Promote Diversity on the Board of Directors [here](#).

### **1.2.5. Board Gender Diversity**

As of March 31, 2025, Tata AutoComp’s Board comprised of 8 members, including 2 women Non-Executive Independent Directors - Ms. Sonali Kulkarni and Ms. Varsha Purandare - representing 25% of the Board.

Read more in our Annual Report [here](#).

### **1.2.6. Board Accountability**

Tata AutoComp ensures the accountability of its Board of Directors and its alignment with the (long-term) interests of shareholders.

### *Board meeting attendance*

During FY 2024-25, the Board of Tata AutoComp met regularly to review strategy, operations, ESG progress, and risk management.

The average Board meeting attendance during FY 2024-25 was 96.22%.

Read more in our Annual Report FY 2024-25 (Page 58) [here](#).

### *Shareholder approval required for changes in bylaw*

As per Section 14(1) of the Companies Act, 2013, any alteration of the Articles of Association (AOA), i.e. the bylaws of the Company, require the approval of shareholders by way of a special resolution passed in a general meeting. This ensures that fundamental changes to the Company's governing framework are subject to shareholder oversight. Other internal policies or Board-approved regulations do not legally require shareholder approval unless explicitly mandated under the Articles or the Companies Act. Accordingly, at Tata AutoComp, amendments to its Articles of Association are carried out only with shareholder approval through a special resolution.

### *Board mandates*

Board members with 4 or less other mandates: Four (4)

Names of the Directors: Mr. Thierry Yves Henri Bollere, Mr. Milind Shahane, Ms. Sonali Kulkarni, and Mr. Thomas Flack.

### *CEO succession plan in place*

Tata AutoComp has a CEO Succession Planning Framework aligned with statutory requirements. As per Section 178(2) of the Companies Act, 2013, our Nomination and Remuneration Committee (NRC) identifies suitable persons for appointments to senior management, including the CEO. Accordingly, the NRC periodically reviews internal leadership pipelines while the Board maintains protocols for both planned and unforeseen transitions, ensuring stability and continuity of leadership.

### *Board performance review*

Tata AutoComp's Board conducted its annual performance evaluation for the period of FY 2024-25, in line with the Companies Act, 2013, covering its Board, its Committees, and individual Directors. Independent Directors were assessed on parameters such as attendance, knowledge of regulatory and sectoral developments, quality of participation, protection of stakeholder interests, and contribution of expertise, with the Director concerned not participating in their own review. The evaluation process and criteria are disclosed in the Annual Report.

Read more in our Annual Report FY 2024-25 (Page 56) [here](#).

### [Board election process](#)

Board members of Tata AutoComp are elected in accordance with the provisions of the Companies Act, 2013 (Sections 149–152, 178, 196–197). Directors are appointed or re-appointed by the shareholders at the Annual General Meeting (AGM), based on the recommendation of the Nomination and Remuneration Committee (NRC) and approval of the Board. Independent Directors are eligible for appointment upon shareholder approval, subject to fulfilling independence criteria. Executive Directors, including the Managing Director and Deputy Managing Director, are appointed under terms approved by shareholders. The election process ensures compliance with statutory requirements on qualifications, independence, diversity, and the maximum number of directorships.

In line with Section 152(6) of the Companies Act, 2013, one-third of Directors retire by rotation at every Annual General Meeting and are eligible for reappointment, ensuring periodic Board elections and continuity.

Read more in our Annual Report FY 2024-25 (Page 56) [here](#).

#### **1.2.7. Board Average Tenure**

Our Board Average Tenure is 5 years.

#### **1.2.8. Board Industry Experience**

Our Board comprises seasoned professionals who collectively bring various domain expertise and critical strategic oversight to Tata AutoComp’s business model. The current composition of the Board reflects a well-balanced blend of skills, experience, expertise, and diversity, aligning perfectly with Tata AutoComp’s business objectives and the responsibilities entrusted to the Board. All the Board of Directors have experience in Leadership, Strategy, Finance, Manufacturing, HR, and Governance.

All our independent or non-executive (6) members have specific industry experience in industrials manufacturing.

#### **Board Members and their Industry Experience**

<b>Name</b>	<b>Position</b>	<b>Industrial Manufacturing Experience</b>
Mr. Thierry Yves Henri Bollore	Non-Executive Chairman	Yes
Mr. Arvind Goel	Non-Executive Vice Chairman	Yes
Ms. Sonali Kulkarni	Non-Executive Independent Director	Yes
Ms. Varsha Purandare	Non-Executive Independent Director	Yes
Mr. Thomas Flack	Non-Executive Non-Independent Director	Yes
Mr. Milind Shahane	Non-Executive Non-Independent Director	Yes

### 1.2.9. CEO Compensation - Success Metrics

Our Chief Executive Officer's (CEO) remuneration includes an incentive component designed to align with company performance. This is divided into two parts: an annual Performance Linked Bonus and a Long-Term Incentive (LTI) Plan.

#### Performance Linked Bonus

This bonus is delivered annually and is contingent on achieving predefined goals. The payout is based on the company's annual operating plan and specific Key Performance Indicators (KPIs), which include financial metrics such as Net Profit.

These parameters are agreed upon with the CEO before the start of each Financial Year. A key feature of the plan is a defined performance threshold; if achievement falls below this value, there is no bonus payout. The plan design and targets are finalized by the board of the company.

#### Long-Term Incentive (LTI) Plan

The CEO is also eligible for a Long-Term Incentive. The specific details of the LTI plan, which include performance parameters, vesting schedule, and the norms for grant and exercise, are finalized by the Board of the Company.

CEO Compensation Component	Period	% of CTC Component	Pay Out Criteria
Fixed Pay	1 Year	58%	Meeting individual KRA's
Variable Pay	1 Year	25%	60% - Financial Performance (net profit); 40% - Customer Satisfaction, Processes, People ESG Performance
Long Term Incentive (LTI) Plan	3 Years	17%	80% - Financial Performance; 20% - Customer Satisfaction, Processes, People ESG Performance

### 1.2.10. CEO Compensation - Long-Term Performance Alignment

To ensure our leadership is focused on sustained, long-term value creation, we have a formal compensation structure that aligns our CEO's variable pay with long-term performance. This framework is governed by the Nomination and Remuneration Committee of the Board, which sets and reviews performance targets to ensure they are aligned with stakeholder interests.

Deferral of Bonus for Short-term CEO Compensation: The primary mechanism for this alignment is our Long-Term Incentive (LTI) Plan, which takes the form of a deferred bonus. (100%)

Performance Period for Variable CEO Compensation: The LTI Plan evaluates performance over a three-year period, ensuring that incentives are tied to strategic achievements rather than short-term results.

The performance metrics for the LTI Plan are derived from our organizational Balanced Scorecard (BSC), which includes a comprehensive mix of financial, strategic, operational, and sustainability targets.

#### **1.2.11. Management Ownership**

The CEO and other Executives do not hold any shares in the Company.

The Paid-up Equity Share Capital as on March 31, 2025, was Rs. 2,012,813,580/- divided into 201,281,358 Equity Shares of Rs. 10/- each. During the year under review, the Company has not issued any shares. The Company has not issued shares with differential voting rights. It has issued neither Employee Stock Options nor Sweat Equity Shares and does not have any scheme to fund its employees to purchase the shares of the Company. As on March 31, 2025, none of the Directors of the Company hold shares of the Company.

*Read more in our Annual Report FY 2024-25 (Page 34,35) [here](#).*

#### **1.2.12. Management Ownership Requirement**

Tata AutoComp does not have formal stock ownership requirements for its Chief Executive Officer or other executive committee members. This is a direct result of our ownership structure as a privately held, unlisted company, which means there is no publicly traded equity available for such requirements.

However, we ensure a strong alignment between executive performance and long-term, sustainable value creation through our compensation framework. This is primarily achieved via our Long-Term Incentive (LTI) Plan, which functions as a deferred bonus. The LTI Plan links variable compensation to the achievement of strategic goals measured over a three-year performance period. This entire framework is overseen by the Nomination and Remuneration Committee of the Board, ensuring that leadership is incentivized to drive sustainable growth and act in the best interests of all stakeholders.

As on March 31, 2025, none of the Directors of the Company hold shares of the Company.

*Read more in our Annual Report [here](#).*

#### **1.2.13. Government Ownership**

No governmental institution holds more than 5% of the Company's total voting rights.

#### **1.2.14. Family Ownership**

No founding individuals or family members, personally or through other companies or organizations, individually have more than 5% of the voting rights of Tata AutoComp.

#### **1.2.15. CEO-to-Employee Pay Ratio**

As part of our commitment to transparency and fair compensation practices, we monitor the ratio of our CEO's total annual compensation to that of our median and mean employee. This

metric provides a clear indicator of internal pay equity and reflects our approach to responsible remuneration.

**Chief Executive Officer-to-Employee Pay Ratio for Tata AutoComp**

Particulars	UoM	Compensation and Ratio	
		Median Employee Compensation	Mean Employee Compensation
Employee Compensation	INR	536,004	849,664
The ratio between total annual CEO compensation and employee compensation	Ratio	CEO to Median Employee Compensation Ratio	CEO to Mean Employee Compensation Ratio
		123.13	77.67

**1.2.16. ESG Governance Oversight**

Tata AutoComp has established a formal governance structure to oversee ESG and sustainability matters at both the Board and executive levels. At the Board level, ESG oversight is embedded through a dedicated ESG Board committee, ensuring strategic accountability and alignment with the Tata Group’s Aalingana goals. The Board meets annually to review ESG targets and progress, reinforcing the Group’s commitment to long-term sustainability and responsible business practices

Complementing this, at the executive level, Tata AutoComp has constituted a dedicated ESG committee comprising members within one reporting level from the CEO.

Additionally, the responsibility for overseeing and managing ESG and sustainability issues is entrusted to the portfolio of our Chief Human Resources Officer (CHRO) (CHRO is on par as the Chief Sustainability Officer). This multi-tiered governance framework ensures that ESG considerations are integrated into corporate decision-making and long-term value creation.

**1.3. Materiality**

**1.3.1. Materiality Analysis**

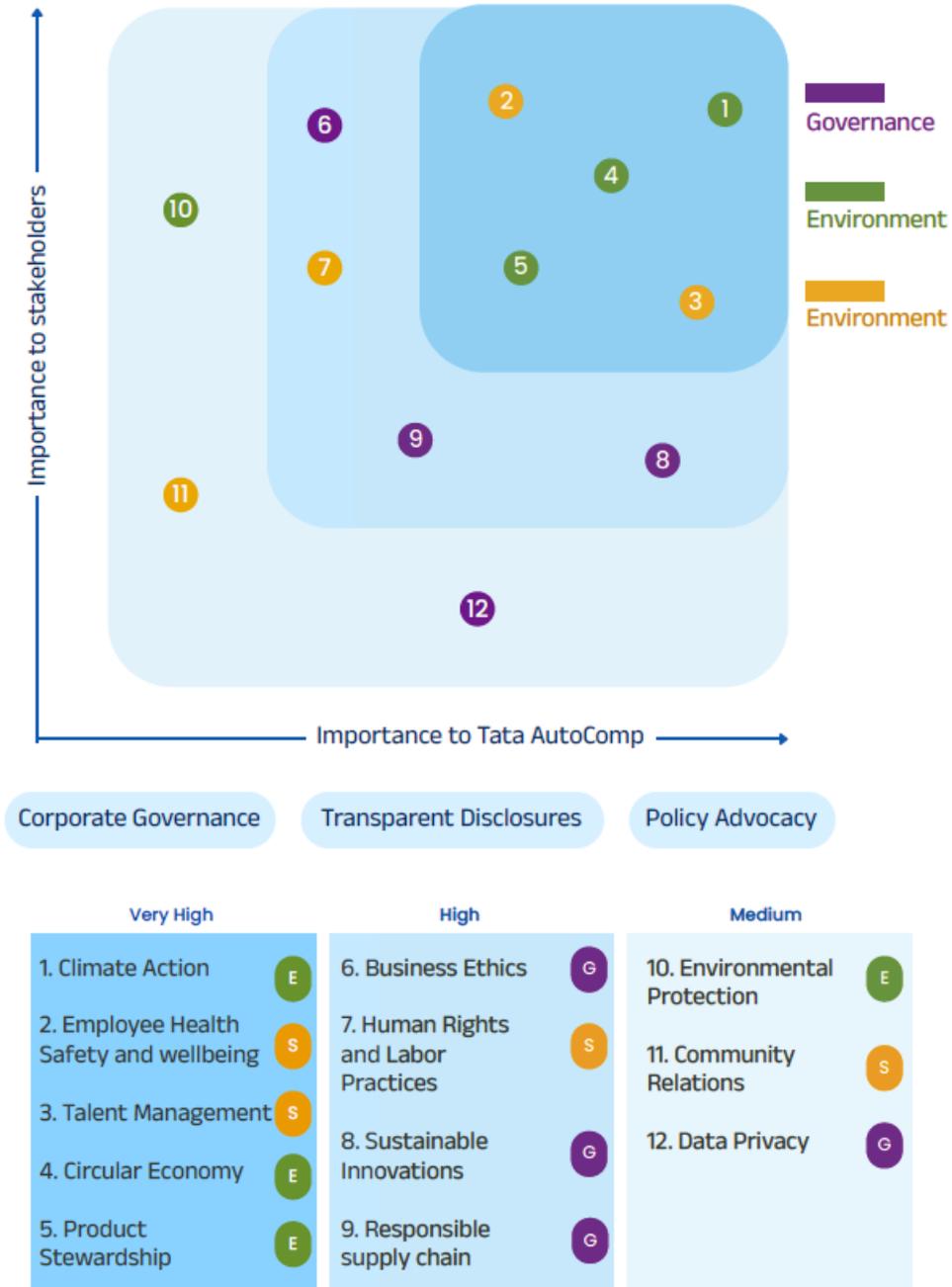
We conducted a materiality analysis in FY 2022-23 and identified our priority issues. We are committed to transparent and responsive disclosures that reflect stakeholder expectations and help build trust, create value, and sustain meaningful partnerships.

We review our materiality assessment every two years or on need-basis to identify ESG topics that are most relevant to its internal and external stakeholders and strategic priorities. This exercise helps align sustainability efforts with broader business objectives and stakeholder expectations.

Insights from the materiality process are used to inform our materiality matrix and play a key role in shaping our risk register. The identified material issues support the Company in recognizing and prioritizing ESG-related risks within our Enterprise Risk Management (ERM)

framework. The process is reviewed annually and includes engagement with relevant stakeholders to ensure a risk-aware and forward-looking perspective.  
 Read more in our Sustainability Report [here](#).

**Materiality Matrix**



We are currently in the process of reviewing our materiality assessment based on the Double Materiality principles, enabling us to identify and prioritise sustainability issues based on their financial implications for our business as well as our impact on society and the planet. We are

currently refreshing this assessment to ensure its continued alignment with leading global standards like ESRS, GRI, BRSR, SASB, and TCFD. This periodic refinement builds upon our established sustainability framework and is a key part of how we integrate sustainability into our core strategy and disclosures.

Double Materiality principles require us to identify and prioritise sustainability issues based on two distinct but interconnected perspectives: their financial implications for our business and our business's impact on people and the planet. Our current assessment, therefore, involves two parallel evaluations:

- An Impact Materiality Assessment, which evaluates the severity (considering scale, scope, and irremediability) and likelihood of our environmental and social impacts through engagement with a wide range of external stakeholders, including OEMs, suppliers, regulators, and employees.
- A Financial Materiality Assessment, which analyses the risks and opportunities each ESG topic presents to our business by examining potential regulatory exposure, shifts in market competitiveness, and long-term resource dependencies.

The findings from both evaluations will be integrated to create the Double Materiality Matrix. These outcomes will be validated with our senior leadership and will serve as the foundation for our future sustainability strategies, target-setting, and disclosures.

### 1.3.2. Material Issues for Enterprise Value Creation

To ensure our sustainability strategy remains focused and effective, we conduct a comprehensive materiality assessment by engaging with key internal and external stakeholders. This process allows us to identify and prioritise the ESG topics that present the most significant risks and opportunities for long-term enterprise value creation. The following table outlines our top material issues and our strategic approach to managing each.

**Material Issues for Enterprise Value Creation**

Particulars	Material Issue 1	Material Issue 2	Material Issue 3
<b>Material Risk or Opportunity</b>	Climate Action	Circular Economy	Talent Management
<b>Category</b>	Climate Transition and Physical Risks	Waste & Pollutants	Human Capital Management
<b>Type of Impact</b>	Risk	Risk	Risk
<b>Business Case</b>	Tackling climate change and managing energy consumption through robust climate action measures are crucial for our business operations and long-term sustainability objectives. These Climate-induced extreme weather risks can lead to sourcing and manufacturing delays and	Effective waste and pollutant management is vital for Tata AutoComp's sustainability and operational integrity. Poor waste management can lead to significant environmental and operational challenges and have a direct impact on cost and revenue. Ensuring the proper	Talent management is imperative for a Company as it attracts and retains top talent, develops skills, ensures leadership continuity, fosters innovation, enhances employee engagement, and contributes to cost efficiency. We are a people and talent-focused Company. The Company

	<p>higher business expenses. Additionally, transition risks, including carbon taxes, adherence to global environmental regulations, and investing in energy-efficient technologies, sustainable materials and biodiversity preservation, could increase costs. It is important to meet global customer expectations, reduce energy costs, and stay ahead of tightening regulations. It also supports Tata Group's Aalingana goals—like achieving net zero by 2040 and switching to 100% renewable energy—ensuring the company remains competitive, responsible, and future-ready in the evolving mobility landscape.</p>	<p>disposal of waste from our operations is crucial for protecting the environment, ensuring safety, and complying with regulatory standards (EPR), which is necessary to maintain operational licenses and avoid penalties. The increasing stringency of regulations emphasizes the necessity for our Company to strengthen its waste management practices to remain compliant and reduce potential environmental and operational risks.</p>	<p>believes in nurturing a skilled workforce, ensuring continuous innovation, driving product excellence and operational efficiency. Strategic talent acquisition and development guarantees a pipeline of capable and skilled professionals who are in tune with industry shifts and changes. Through its initiatives, Tata AutoComp fosters a positive work culture, enabling the Company to attract, develop, and retain top-tier talent.</p>
<p><b>Business strategies</b></p>	<p>At Tata AutoComp, we have set an ambitious target to achieve target Net Zero by 2045. Additionally, we have also set a target to reduce Scope 1 + 2 emissions by 25% (2020 baseline) by 2030 and are tracking our Carbon emissions in accordance with IPCC standards and GHG Protocol. We have also committed to increase RE by 20% (2024 baseline) by 2026 and have already achieved 75% of our target with RE accounting for 15.1% of the energy mix. We are undertaking various initiatives such as deploying eco-friendly technologies, increasing the use of renewable energy, optimizing processes for greater efficiency and conserving resources to minimize environmental impact.</p>	<p>Tata AutoComp has implemented several strategies to contribute to our waste management initiatives. Effective Waste Reduction and Recycling: We invest in employee training programs to educate workforce on waste reduction techniques and best practice. Established robust recycling programs to ensure maximum recovery and reuse of materials. Hazardous waste management: Implemented a strategy to reuse sheet molding compound (SMC) sludge. Ongoing practices for reducing waste and providing sustainable fuel. Use of recycled raw materials: Commitment to reducing reliance on virgin materials.</p>	<p>Tata AutoComp has 4 Learning Academies and Flagship Leadership Development Programs which provide provisions for employee development programs to retain top-tier talent and cultivate a strong pipeline for leadership roles. Employee benefits include variety of benefits, such as leave policies, stress management programs, comprehensive family benefits, competitive compensation, work flexibility, retirement savings plans, and numerous opportunities for growth. Further, we have two leadership programs "Bluemint" and "Leapvault"</p>

### 1.3.3. Materiality Metrics for Enterprise Value Creation

To ensure accountability and drive progress on our material issues, we have established a framework of specific targets and metrics to manage our performance. We are committed to transparently reporting our progress against these goals to our stakeholders. Furthermore, our governance structure ensures that performance on these key ESG indicators is integrated into our strategic review process and linked to executive performance evaluation.

#### Metrics for evaluating our material issues for Enterprise Value Creation

Particulars	Material Issue 1	Material Issue 2	Material Issue 3
<b>Material Issue</b>	Climate Action	Circular Economy	Talent Management
<b>Target/ Metric</b>	<ul style="list-style-type: none"> <li>Net Zero emissions by 2045</li> <li>Reduce Scope 1 + 2 emissions by 25% (2020 baseline) by 2030</li> <li>Achieve 100% RE by 2030</li> <li>Increase RE to 20% by 2026</li> </ul>	<ul style="list-style-type: none"> <li>Ensure Zero waste to landfill by 2030</li> <li>Ensure 2x of recycled material in the total input material by 2025, (2020 baseline)</li> </ul>	<ul style="list-style-type: none"> <li>Achieve attrition of Hi-pot of 0% (YoY)</li> <li>Maintain voluntary attrition rate &lt;10% (YoY)</li> <li>Ensure 50% female employees in workforce by 2030</li> <li>Achieve 5 days (or 40 hours) of training for each employee (YoY) by 2026</li> <li>Maintain employee satisfaction score greater than 90% (YoY)</li> <li>Ensure 100% of employees receive regular performance and career development reviews (YoY)</li> </ul>
<b>Target year</b>	2045	2030	2030
<b>Progress</b>	<p>We assess and disclose our greenhouse gas emissions, focusing on Scope 1, Scope 2, and Scope 3 emissions throughout our value chain.</p> <p>We are also in the process of submitting a commitment to the Science-Based Targets initiative (SBTi).</p> <p>Additionally, renewable electricity (solar energy) constitutes 15.1% of our energy mix in FY 2024-25. This has resulted in our scope 2 emissions reduction by 17%, and scope 3 emissions reduction by 10% in</p>	<p>We have achieved a 43% reduction in waste generation by innovatively replacing traditional polypropylene boxes with trolleys for product distribution.</p> <p>We have also placed a significant focus on hazardous waste reduction through the strategic reuse of sheet moulding compound (SMC) sludge, and we have managed to cut down hazardous waste.</p> <p>Additionally, we have utilised 12.5% recycled aluminium and 8.11% recycled iron/steel in our own operations.</p>	<p>We have onboarded a total of 1,421 new employees this year, with women representing 26% of new hires.</p> <p>Moreover, the Leap Vault programs are successful, with 66% of Leap Vault 1.0 participants advancing to higher roles and 70% of Leap Vault 2.0 participants being succession-ready for senior leadership positions within two years.</p> <p>We sponsor education programs across top institutes—PGDM at IIM Nagpur, B.Tech via BITS Pilani, and an EV-focused diploma at Vishwakarma University—to upskill</p>

	comparison to the previous financial year.		<p>employees from the shopfloor to leadership.</p> <p>We also provide 100% of our employees with regular performance feedback, ensuring continuous improvement and alignment with organizational goals.</p> <p>Most importantly, our average training hours per FTE have significantly improved to 39 hours, enabled by Digital training &amp; in-person Workshops, a dedicated L&amp;D Centre and DOJO room at each Business Division for trainings of workers. This emphasizes our dedication to professional growth.</p>
<b>Executive Compensation</b>	<p>At Tata AutoComp, our Board of Directors meet annually to check and review our progress on our Tata Aalingana goals. This responsibility further cascades to the management, where the Chief Human Resources Officer (CHRO) is accountable for the sustainability performance with 10% of his variable pay linked to the performance of Talent Management. The Corporate Lead – Sustainability, under the CHRO, spearheads all the ESG and climate action initiatives, focusing on both current and future performance. Around 60% of the Corporate Lead – Sustainability’s annual performance bonuses are connected to meeting short-term and long-term ESG and climate objectives. This incentive system underscores our dedication to the ESG targets established in FY 2022-23. These ESG targets are integral to Corporate Lead-Sustainability’s key duties and are also embraced as Company-wide objectives, with targets distributed among all relevant teams to ensure unified advancement towards our environmental commitments.</p>		

#### 1.3.4. Material Issues for External Stakeholders

Our responsibility extends beyond our own operations to the external stakeholders impacted by our business, products, and supply chain. We believe that proactively managing our impact on local communities and supply chain partners is essential for fostering inclusive growth and building a resilient, ethical value chain. The following table details our approach to the material issues that most significantly affect these key external stakeholder groups.

##### Material issues for our External Stakeholders

Particulars	Impact 1	Impact 2
<b>Material Issue for External Stakeholder</b>	Community Relations	Responsible Supply Chain
<b>Cause of the impact</b>	Operations	Operations, Supply Chain
<b>External stakeholder/ impact areas evaluated</b>	Environment, Society	Environment, Society, Consumers/end-users, external employees (e.g. supply chain, contractors)
<b>Topic relevance on external stakeholders</b>	Our commitment to environmental sustainability and community	We are committed to environmental sustainability through a Sustainable

	engagement is demonstrated by our water conservation project in Khed, Pune, and Sanand which promotes efficient irrigation, community awareness, and rainwater harvesting, benefiting 5,457 individuals. Our "Green Canopy - Tree Plantation" project transforms barren lands into urban forests to enhance biodiversity and reduce carbon footprints. Till date we have planted and maintained 30,000 plus trees, which account for 3,91,349.45 kgCO <sub>2</sub> e sequestration. Socially, we focus on improving healthcare for women and children, promoting women's education, health, skilling, and empowering people with disabilities. Our Menstrual Hygiene Management Initiative reached 43,000 women and girls, while the Saksham Adult Literacy Program builds essential skills. Through the Girls Skilling program in EV & Operations, we have trained and placed over 2,000 marginalized girls in Pune & Sanand and over 5,000 girls through Girls Scholarship Program Through Workers Facilitation Centre, migrant & marginalized workers are educated on their legal & social security rights.	Supply Chain Framework that addresses critical sustainability issues. We prioritize suppliers offering sustainable materials and collaborate with them to address ESG concerns like emissions reduction, energy efficiency, and water and waste management, conducting evaluations based on ESG criteria. These efforts align with Tata Aalingana Goals, reducing supply chain risks and protecting the environment. Through the Tata Affirmative Action Programme (TAAP), we empower suppliers from disadvantaged communities, including SCs, STs, women, and PwDs, to enhance resilience and promote inclusive growth. Our Sustainable Supply Chain Framework aids in improving suppliers' sustainability capabilities, with initiatives like Utkarsh, the Kaushal Programme, and ESG workshops offering essential training and capacity-building support.
<b>Type of impact</b>	Positive	Positive

### 1.3.5. Materiality Metrics for External Stakeholders

To move beyond activity reporting to understand our real-world effects, we are committed to quantitatively measuring our impact on external stakeholders. We use a structured approach to track key output and impact metrics for our community and supply chain programs, allowing us to assess the value we create. The following table details the specific metrics we use to evaluate our performance in these critical areas.

#### Metrics for our External Stakeholders

Particulars	Impact 1	Impact 2
<b>Material Issue for External Stakeholder</b>	Community Relations	Responsible Supply Chain
<b>Output metric</b>	Number of beneficiaries	Supplier in TAAP community, ESG compliant supplier
<b>External stakeholder/ impact areas evaluated</b>	Environment, Society	Environment, Society, Consumers/end-users, external employees (e.g. supply chain, contractors)
<b>Impact valuation</b>	Quantified quality of life impacted	Access to product/service with positive impact provided
<b>Impact metric</b>	Number of lives impacted	Enhanced supply chain

## 1.4. Risk and Crisis Management

### 1.4.1. Risk Governance

Tata AutoComp has a well-established risk governance framework in place with oversight at multiple levels:

**Board-Level Oversight:** The Company has a formal risk governance framework with dedicated Board-level oversight. A Board level Audit Committee comprising independent and non-executive Board members is assigned for risk oversight responsibilities.

**Functions that own and manage risks (First Line):** As the first line of Défense, operational managers own and manage risks. They are also responsible for implementing corrective actions to address process and control deficiencies. Operational management is responsible for maintaining effective internal controls and for executing risk and control procedures on a day-to-day basis

**Risk and Compliance Oversight (Second Line):** Dedicated Risk Committee at the senior management/executive level is in place to oversee risk management and compliance, excluding the CEO. Control functions such as risk and compliance management are responsible for setting controls and ensuring compliance with risk-related policies.

**Internal/External Audit (Third Line):** An independent internal audit team provides objective assurance on the effectiveness of the Company's risk management and compliance frameworks.

External auditors, regulators, and other external bodies reside outside the Company's structure, but they have an important role in the organization's overall governance and control structure. This three-lines-of-defense model ensures robust and integrated risk oversight across all levels of the organization.

### 1.4.2. Risk Management Processes

#### *Risk Review*

We have embedded a robust enterprise risk management framework across our operations. We regularly assess the Company-specific risk exposure, considering both likelihood and magnitude of identified risks across Tata AutoComp's value chain. This forward-looking approach enables us to anticipate risks and vulnerabilities and implement strategic interventions that safeguard business continuity and resilience.

Our framework for determining risk appetite is embedded within our enterprise risk management system. Business-unit risk registers capture risks at the operational level, which are reviewed by the Risk Management Function and validated by Board-level Audit Committee. This process ensures that risk thresholds are defined in line with the Company's strategic objectives and are consistently applied across all business units. To address these exposures, we implement targeted mitigating actions.

Our risk review process considers Company-specific risk exposure (considering likelihood and magnitude), the risk appetite for the identified risks and develops appropriate mitigating actions for the identified risks.

*These details can be found in our detailed Risk Register.*

#### *Risk Exposure*

We review our Company's risk exposure on a regular basis through comprehensive assessments that are supported by business-unit risk registers and overseen by the Group Risk Management Committee. These reviews ensure that risks are continuously monitored and that mitigation plans remain aligned with our strategic priorities. Formal reviews of risk exposure are conducted once in two years.

*These details can be found in our detailed Risk Register.*

#### *Risk Management Process Audit*

We have conducted an internal risk audit in the last two years. The last internal audit of the risk management process was conducted in FY 2024-25.

#### *Risk Culture*

Comprehensive enterprise risk and control management are seamlessly integrated into multiple aspects of our business processes, including annual goal setting and performance evaluation to incorporate risk in our company culture.

We conduct regular risk management training for all Non-Executive Directors to embed risk culture from the leadership level. Additionally, focused training is conducted throughout the Company on risk management principles.

Risk criteria are also incorporated in the development of products and services at every stage, involving the identification of evidence and potential risks, assessment of their impact on project schedules, expenses, workforce, and resources, and the development of proactive and remedial measures to address these risks.

Further, our employee evaluation criteria incorporate financial incentives which incorporate risk management metrics. The Human Resources department diligently monitors and periodically evaluates employees based on risk management criteria, with employee risk reporting recognized and valued as part of the annual assessment process. A robust system is in place to actively engage staff in identifying and reporting potential risks throughout the organization.

### **1.4.3. Emerging Risks**

Effective risk management is fundamental to our long-term growth and is managed through a comprehensive framework designed to be agile and responsive to our evolving business

landscape. As part of this forward-looking process, we formally identify and analyze long-term emerging risks to ensure our strategy remains resilient. The following section details our assessment of the most significant emerging risks we have identified.

### Emerging Risks for Tata AutoComp

Particulars	Emerging Risk 1	Emerging Risk 2
<b>Name of the emerging risks</b>	Evolving ESG Regulatory compliances	Artificial Intelligence in Business
<b>Category</b>	Others	Technological
<b>Description</b>	<p>ESG regulatory compliances and disclosures are evolving constantly and are getting more stringent with respect to international sustainability and ethical practices. With upcoming frameworks like the CSRD, EUDR, and EU Battery Regulations among others, Tata AutoComp must comply with new environmental, social, and governance standards. These regulations require adherence to emissions standards, labor practices, and corporate governance norms. Global variability in ESG regulations adds complexity, necessitating continuous monitoring and adaptation. Despite current compliance with Indian ESG requirements and voluntary GRI disclosures, Tata AutoComp faces challenges in aligning with international frameworks, posing regulatory risks as global laws evolve.</p> <p>Also, The US regional reciprocal tariffs have reshaped the global trade landscape, introducing new business challenges. Businesses face heightened uncertainty and complexity in global trade. The recent imposition tariffs on imported automobiles and auto parts have emerged as a critical geopolitical and trade-related risk. In addition to this, tariffs on steel, aluminum and copper impact automotive production and pose an auto supply chain risk. The increasing complexity of the tariffs affect our position to manage and mitigate these risks.</p>	<p>At Tata AutoComp, AI is acknowledged as a transformative yet emerging risk that introduces both opportunities and challenges across multiple areas of the business. Strategically, AI has the potential to reshape competitive dynamics, requiring adjustments in business models and strategic investments. From a market perspective, AI influences consumer preferences, particularly increasing demand for AI-enhanced vehicle components. Operationally, the integration of AI into manufacturing processes presents challenges such as system integration, reliance on data quality, and the need for workforce transformation. Externally, AI poses regulatory and compliance challenges, alongside heightened cybersecurity threats.</p>
<b>Impact</b>	<p>Tata AutoComp is a key supplier of automotive components to global Original Equipment Manufacturers (OEMs), many of whom operate in or supply to the US. The impact of these tariffs is multifold:</p> <ul style="list-style-type: none"> <li>• Cost pressure: Tariffs increase the cost of Indian auto components making them less attractive than locally sourced components.</li> </ul>	<p>The impact of AI is multifaceted. Strategically, failing to effectively integrate AI could result in a loss of competitive edge. Marketwise, shifts in consumer demand towards AI-driven components necessitate innovation and adaptation to stay relevant. Operational disruptions may arise from technological failures or integration issues, while workforce reskilling or upskilling is essential to manage new AI technologies. Externally, compliance with evolving AI-related</p>

	<ul style="list-style-type: none"> <li>• Margin compression: Higher tariffs can decrease profit margins unless offset by price increases, which may not be suitable for price sensitive markets.</li> <li>• Supply chain disruption: OEMs may shift to tariff-free regions, affecting our orders and contracts.</li> <li>• Strategic uncertainty: The complexity and uncertainty affects long-term planning.</li> </ul>	<p>regulations could be complex and costly, and cybersecurity threats associated with AI adoption could compromise data security and operational continuity. To address these impacts, AI is a critical focus within our comprehensive risk management strategy, requiring diligent risk identification, evaluation, and mitigation.</p>
<p><b>Mitigating actions</b></p>	<p>To mitigate ESG regulatory risks,</p> <ul style="list-style-type: none"> <li>• Tata AutoComp will strengthen its compliance, monitoring and reporting by adopting more frameworks and integrating international frameworks like the CSRD, EUDR, and EU Battery Regulations alongside existing GRI and BRSR compliance to align with global standards.</li> <li>• Improving ESG Data Management and monitoring our progress by developing systems for accurate and transparent data collection and reporting to meet diverse regulatory demands.</li> <li>• Provide training and capacity building programs to ensure employees understand and support ESG initiatives.</li> <li>• Scenario Planning to conduct risk assessments and develop contingency plans to address potential ESG-related disruptions.</li> <li>• To mitigate the impact of changing US tariffs, we plan to adopt a multi-faceted strategy that includes expanding exports to tariff-neutral regions to reduce the reliance on the US market. Establishing manufacturing facilities can enable us to cater to the local market and avoid import duties. Active collaboration with OEMs to develop cost-sharing and resilient sourcing models can help us prepare for uncertain, complex scenarios and supply chain disruptions.</li> </ul>	<p>Tata AutoComp plans to mitigate AI-related risks through a comprehensive strategy that includes forming strategic partnerships and investing in AI R&amp;D to maintain competitiveness. Strategic plans will be updated to align with AI advancements. Market research will guide product diversification to meet demand for AI-driven features. Operationally, we will ensure smooth AI integration through phased implementation, robust data governance, and workforce training. To address regulatory and cybersecurity concerns, a compliance framework and enhanced cybersecurity measures alongside the existing measures will be established, along with ethical AI guidelines. Continuous risk monitoring, scenario analysis, and stress testing will further prepare Tata AutoComp for potential disruptions, enabling the Company to leverage AI benefits while minimizing risks.</p>

## 1.5. Business Ethics

### 1.5.1. UN Global Compact Membership

While Tata AutoComp is not a member of the United Nations Global Compact, its significant investor (26% shareholding) - Tata Motors - is a signatory of the United Nations Global Compact.

Read more on UNGC's website [here](#).

### 1.5.2. Codes of Conduct

The [Tata Code of Conduct \(TCOC\)](#) serves as a guiding light for maintaining the highest standards of ethical behaviour and integrity across all aspects of Tata AutoComp's operations. It is a comprehensive framework that outlines our commitments to ethical practices, transparency, and accountability, ensuring that every decision and action aligns with our core values. By adhering to our TCOC, Tata AutoComp fosters a culture of responsibility and respect, encouraging employees to uphold ethical principles and report any concerns without fear of retaliation.

The Code supported by various other policies encompasses the following areas:

- **Corruption and Bribery:** Through our Code, we uphold a zero-tolerance approach to bribery and corruption and ensure compliance with all applicable anti-corruption laws. We do not tolerate bribery or corruption in any form. The Code is also supported by the Anti-bribery and Anti-corruption Policy.
- **Discrimination:** We strive to balance the interests of our stakeholders, treating each of them fairly and avoiding unfair discrimination of any kind. The Code is also supported through the Non-Discrimination and Anti-Harassment Policy.
- **Confidentiality of Information:** Our employees are to respect and protect all confidential information and intellectual property of our Company.
- **Conflicts of Interest:** Our Code safeguards the Company from potential conflicts of interest. Our employees and executive directors are to always act in the interest of our Company and ensure that any business or personal association, including close personal relationships which they may have, does not create a conflict of interest with their roles and duties in our company or the operations of our Company.
- **Antitrust and anti-competitive practices:** Our Code lays guidance for fair competition and we are not to enter into any activity constituting anti-competitive behaviour.
- **Insider Trading:** Our Code prohibits insider trading. Our employees must not indulge in any form of insider trading nor assist others, including immediate family, friends or business associates, to derive any benefit from access to and possession of price-sensitive information that is not in the public domain.
- **Environment, Health and Safety:** Guided by the Tata Group, our Code outlines our duties towards the community and environment. We strive for environmental sustainability and comply with all applicable laws and regulations. This is also supported by our Sustainability Policy, Environment Policy and Safety and Health Policy.

- Whistle Blowing: We maintain a robust whistle-blowing framework and 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. This is also supported by a Whistle Blower Policy.

*Read our Tata Code of Conduct (TCOC) [here](#).*

*Read our Anti-Bribery and Anti-Corruption (ABAC) Policy [here](#).*

*Read our Non-Discrimination and Anti-Harassment Policy [here](#).*

*Read our Whistle Blower Policy [here](#).*

*Read our Sustainability Policy [here](#).*

*Read our Environment Policy [here](#).*

*Read our Safety and Health Policy [here](#).*

### **1.5.3. Anti-Bribery & Anti-Corruption Policy**

Our Company's Anti-Bribery and Anti-Corruption (ABAC) Policy and Tata Code of Conduct provide a comprehensive framework to prevent bribery and corruption across all levels of operations. The Policy is endorsed by our Executive Management.

- Prevention of Bribery and Corruption: The Policy strictly prohibits offering, promising, giving, demanding, or accepting any form of bribe or corrupt payment. We maintain a zero-tolerance stance toward any violation.
- Guidelines for Gifts: The Policy states that employees may only give or receive gifts and hospitality that are reasonable, proportionate, made in good faith, and do not create an appearance of influencing business decisions. Gifts of cash or cash equivalents are strictly prohibited.
- Guidelines for Political Contributions: Our Company does not support any specific political party or candidate. Employees are prohibited from making political contributions from company funds or resources unless they are approved by the Board of Directors and made through a transparent, non-discretionary vehicle in compliance with the law.
- Charitable Contributions and Sponsorships: Following our Anti-Bribery and Anti-Corruption Policy, all charitable contributions and sponsorships must be for genuine purposes, transparent, duly approved, and are subject to due diligence to ensure they are not used as a channel for bribery.

Employees undergo regular training and awareness programs on anti-bribery and corruption standards, ensuring adherence to both legal requirements and Company policies.

Established procedures enable employees and stakeholders to report suspected breaches confidentially through mechanisms detailed in our Whistle Blower Policy, with a strict guarantee of no retaliation for reports made in good faith. Reported cases are investigated promptly by a designated Compliance Officer.

The Company's Audit Committee monitors the effectiveness and implementation of the Anti-Bribery & Corruption Policy, underscoring our commitment to ethical business practices at the highest level of governance.

Read our Tata Code of Conduct (TCOC) [here](#).  
 Read our Anti-Bribery and Anti-Corruption (ABAC) Policy [here](#).  
 Read out Whistle Blower Policy [here](#).  
 Read our Sustainability Policy [here](#).  
 Read our Environment Policy [here](#).  
 Read our Safety and Health Policy [here](#).

#### 1.5.4. Whistleblowing Mechanism

Tata AutoComp has a robust Whistle Blower Policy that enables employees and third parties to report concerns confidentially, including anonymously, through designated channels. The Policy ensures protection against retaliation, maintains strict confidentiality, and outlines clear procedures for investigation and disciplinary action. Awareness is promoted through regular training, onboarding sessions, and ongoing communication across the organization.

We have defined a dedicated department and role responsible for whistleblowing mechanism. The whistleblower mechanism is governed by the Audit Committee and oversight is provided by the Chief Ethics Counsellor/ Chairperson of the Audit Committee. The Policy allows whistleblowers to submit reports anonymously. All reports and records received are kept confidential and access is restricted. No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Protected Disclosure under this Policy. We place strong emphasis on awareness and training. All new employees are provided with training on the use of reporting channel, while refresher sessions are conducted regularly across the workforce during their onboarding session.

All protected disclosures concerning any matter is addressed to the Chief Ethics Counselor of the Company or to the Chairperson of the Audit Committee and can also be emailed to [whistle.blower@tataautocomp.com](mailto:whistle.blower@tataautocomp.com).

Read our Tata Code of Conduct (TCOC) [here](#).  
 Read our Anti-Bribery and Anti-Corruption (ABAC) Policy [here](#).  
 Read out Whistle Blower Policy [here](#).  
 Read our Sustainability Policy [here](#).  
 Read our Environment Policy [here](#).  
 Read our Safety and Health Policy [here](#).

#### 1.5.5. Reporting on Breaches

Tata AutoComp publicly reports breaches against its Code of Conduct. During the year, we did not face any breaches against our Code of Conduct.

##### Number of Ethics Breaches in FY 2024-25

Reporting Areas	Number of Breaches in FY 2024-25
Corruption and Bribery	0
Discrimination and Harassment	0
Customer Privacy Data	0
Conflict of Interest	0
Money Laundering or Insider trading	0

Since there were no corruption cases in FY 2024-25, the amount of fines was INR 0 and 0 convictions were made during the year.

## 1.6. Policy Influence

### 1.6.1. Contributions & Other Spending

The Company has not contributed to political campaigns, organizations, lobbying groups, or tax-exempt entities in FY 2024-25. This approach underscores the Company's commitment to integrity and neutrality in all corporate activities, prioritizing ethical conduct and transparency. The Company adopts a well-defined and strategic approach to public policy engagement through Trade Association. Our advocacy efforts are designed to foster constructive dialogue with policymakers through industry associations enabling us to contribute meaningfully to the development and refinement of policies at the state, national and even international levels.

#### Total monetary contributions and spending (INR)

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Lobbying, interest representation or similar	INR	-	-	-	-
Local, regional or national political campaigns / organisations / candidates	INR	-	-	-	-
Trade associations or tax-exempt groups (e.g. think tanks)	INR	1,10,400	2,10,400	3,58,400	6,42,430
Other (e.g. spending related to ballot measures or referendums)	INR	-	-	-	-
<b>Total contributions and other spending</b>	INR	1,10,400	2,10,400	3,58,400	6,42,430
<b>Data Coverage (as a percentage of Operations)</b>	INR	100%	100%	100%	100%

### 1.6.2. Largest Contributions & Expenditures

During FY 2024-25, Tata AutoComp did not make any contributions to or expenditures to political campaigns or organizations. However, Tata AutoComp did pay membership fees to trade associations which is a best practice to promote industry-wide reforms.

#### Key Issues and Topics

Issue or Topic	Corporate Position	Description of Position / Engagement	Total spend in FY 2024-25 (INR)
Contribution to trade associations	Support	All these expenditures are on membership fees for CII, ACMA and EFI. This is an industry best practice standard promoting institution.	642,430

#### Details of our Large Expenditures\*

Name of Organization	Type of Organization	Total spend in FY 2024-25 (INR)
Confederation of Indian Industry	Trade association	389,400
The Automotive Component Manufacturers Association of India	Trade association	200,000
Employer's Federation of India	Trade association	53,030

\*All these expenditures are towards membership fees. This is industry best practice standard promoting institution. These are the three contributions made to trade associations. The total contributions made during FY 2024-25 amounted to INR 6,42,430.

### 1.6.3. Lobbying and Trade Associations - Climate Alignment

Tata AutoComp does not participate in any kind of lobbying activities – including climate alignment.

## 1.7. Supply Chain Management

### 1.7.1. Supplier Code of Conduct

Tata AutoComp has established a Responsible Value Chain Partner Code of Conduct which is a mandatory requirement for all key material suppliers during onboarding. Additionally, we also incorporate the related clauses into the terms and conditions of all our supplier contracts. The Policy applies to the third-party entities providing products or services to the Company or acting on behalf of the Company, including but not limited to vendors, suppliers, contractors, subcontractors, consultants, agents, advisors, value-chain partners, service providers, manufacturers, distributors, sales representatives, channel partners, intermediaries, and business partners.

Compliance with this is a prerequisite for supplier selection and is also embedded in all supplier contracts. All relevant partners are required to acknowledge and abide by the Code as part of their contractual obligations with Tata AutoComp.

The Responsible Value Chain Partner Code of Conduct comprehensively addresses the following key areas:

**Labour Practices and Human Rights:** Prohibits forced and child labor, ensures freedom of association and collective bargaining, promotes non-discrimination, equal remuneration, fair wages and benefits, and a harassment-free workplace. It also emphasizes the importance of maintaining decent working conditions, including reasonable working hours, rest periods, and a respectful and inclusive work environment.

**Occupational Health and Safety:** Requires the provision of safe, healthy, and hygienic working environments. Suppliers must proactively identify and mitigate health and safety risks, ensure emergency preparedness, and comply with all applicable safety regulations and best practices.

**Environmental Responsibility:** Emphasizes pollution prevention, reduction of greenhouse gas emissions, energy efficiency, responsible resource utilization, water and waste management, and the conservation of natural ecosystems. The Code also mandates biodiversity conservation, including the protection of natural habitats, prevention of deforestation, and promotion of sustainable land use practices.

**Business Ethics:** Enforces strict standards against bribery, corruption, conflicts of interest, and anti-competitive behavior. It promotes transparency, integrity, and accountability in all business dealings, including compliance with laws, responsible sourcing, and data privacy. Ethics (anti-bribery, anti-corruption, conflict of interest, anti-competitiveness).

*Read our Sustainability Guidelines for Suppliers [here](#),*

*Read our Responsible Value Chain Partner Code of Conduct [here](#).*

### 1.7.2. Supplier ESG Programs

We prioritize supplier engagement as a critical component of our strategy. We see supplier engagement as necessary for building long-term trusted relationships with suppliers. Given the evolving regulatory landscape and changing customer preferences, we prioritize engaging our suppliers on ESG parameters and the importance of integrating into mainstream business.

The oversight of implementation of the supplier ESG programs lies with the executive management.

Purchasing practices are reviewed to ensure alignment of procurement processes with its Responsible Value Chain Partner Code of Conduct through supplier meets, supplier engagement trainings on ESG, and purchase team training. In purchasing agreements, we have included clauses related to suppliers' compliance with the Responsible Value Chain Partner Code of Conduct. This process reinforces the Company's responsible sourcing commitments.

Tata AutoComp has established a centralized ESG responsibility and governance framework within its procurement function, which is cascaded down to Business Unit (BU) Purchase Heads. These leaders are entrusted with driving key sustainability objectives, including the reduction of Scope 3 emissions from purchased goods and services, decarbonization of the value chain, and promotion of human rights. Under this framework, the ESG lead plays a pivotal role in conducting supplier ESG assessments, on-site audits, training sessions, and workshops to build supplier capabilities. Oversight mechanisms are clearly defined to ensure the effective implementation of supplier ESG programs. Executive Management serves as the highest accountable decision-making body for these initiatives, ensuring strategic alignment and sustained impact across the organization.

We have a dedicated team comprising internal members and executive leaders who curate supplier ESG programs. The programs are designed to build awareness of the importance of adopting sustainable practices and to communicate our commitments and targets associated with ESG initiatives. Our supplier engagement efforts are further enhanced by flagship initiatives like the Utkarsh Program, a year-long engagement developed with the Automotive Component Manufacturers Association (ACMA), and the Kaushal Program, a strategic initiative to enhance suppliers' operational competencies.

Tata AutoComp is committed to fostering sustainability across its supply chain through proactive supplier engagement and capacity-building initiatives. The company organises an Annual Supplier Meet to encourage collaboration and share best practices. It conducts ESG-focused training sessions for suppliers to enhance awareness and implementation of responsible practices. Tata AutoComp also sponsors GreenCo certification for suppliers, reinforcing its commitment to environmental excellence. Internally, the purchase team undergoes training on Life Cycle Assessment (LCA) to integrate sustainability into procurement decisions. These initiatives collectively support Tata AutoComp's vision of building a responsible and future-ready value chain.

Training for Company’s buyers and internal stakeholders in their roles in the supplier ESG programs is conducted regularly. These training courses cover ESG requirements in procurement, responsible sourcing standards, and supplier engagement protocols.

Supplier corrective action and improvement plans are implemented for all suppliers who fall under different categories (Novice, Beginner, Intermediate and Advanced) post assessment. These plans ensure that identified ESG gaps are systematically addressed within defined timelines. Hence, Suppliers with better ESG performance are preferred in supplier selection and contract awarding.

Read more in our Sustainability Report [here](#).

### 1.7.3. Supplier Screening

We have a systematic supplier screening process to identify significant partners and manage risk across our value chain. Our screening process is comprehensive, covering Environmental, Social, and Governance (ESG) performance, as well as Business Relevance. This is reflected in our initial focus on key Tier 1 partners that account for approximately 80% of our raw material procurement spend.

We screened our suppliers against the following aspects of environmental, social and governance beyond their business relevance:

Environment	Social	Governance	Business Relevance
Environmental Policy and Management	Health and Safety	Business ethics	Cost
Climate action		Responsible supply chain	Quality
Waste management	Human Rights		Corporate governance
Water management		Substitutability	
Product stewardship		Proximity of suppliers	
Biodiversity			Customer Preference

Our risk-based screening methodology considers a combination of factors to ensure a holistic assessment. We evaluate country-specific risk by considering the proximity of suppliers to our facilities, country-specific, sector-specific and commodity-specific risk by aligning with automotive industry standards and customer mandates, and commodity-specific risk by analyzing procurement value and the substitutability of materials. To map these risks, we employ several tools:

- Supplier Self-Assessment Questionnaires (SAQs) aligned with CDP, GRI, and UNGC frameworks.
- Integration of ESG clauses into the Supplier Code of Conduct, which is mandatory for all critical Tier 1 suppliers.
- Use of third-party sustainability rating platforms to validate disclosures where available.
- Independent third-party audits and desktop-based due diligence supported by internal audits for high-risk suppliers.
- Periodic engagement sessions, surveys, and capacity-building programs to encourage accurate data reporting and performance improvement.

Suppliers were categorized into four performance levels—Novice, Beginner, Intermediate, and Advanced—based on their environmental maturity and compliance. This classification enabled us to pinpoint suppliers that may be at higher risk due to inadequate environmental practices. For suppliers identified as needing improvement, we developed tailored Corrective Action Plans (CAPAs) and provided hands-on support through workshops, training sessions, and implementation guidance. Our goal is to not only mitigate environmental risks but also to empower our suppliers to adopt more sustainable operations and align with Tata AutoComp's ESG objectives.

*Read more in our Sustainability Report [here](#).*

#### **1.7.4. Supplier Assessment and Development**

We conducted a comprehensive supply chain assessment focused on evaluating suppliers' ESG performance. This assessment involved mapping current supply chain practices, developing a criticality framework, and assessing the ESG performance of suppliers. Suppliers were evaluated on ESG criteria through self-assessments and desk assessments with systematic verification of evidence.

Supplier assessments, whether conducted as desk reviews or on-site evaluations, are carried out using recognized standards and methodologies from established industry or multi-stakeholder initiatives. These include frameworks such as the Responsible Business Alliance (RBA), Automotive SAQs by Automotive Component Manufacturers Association (ACMA) of India, ILO conventions, UN Global Compact principles, and established standards and frameworks for the assessment. This structured approach ensures consistency, credibility, and alignment with global best practices in evaluating supplier performance on ESG parameters.

The Business Unit Purchase heads were responsible for monitoring and measuring the ESG performance of suppliers, ensuring the authenticity and completeness of the questionnaire submitted. To effectively identify our critical/significant suppliers, we evaluate them based on several key criteria: highest procurement value, customer preference, supplier substitutability, and proximity to our Tata AutoComp locations. This comprehensive assessment ensures we align with both operational priorities and customer needs.

For suppliers identified as needing improvement, we developed tailored Corrective Action Plans (CAPAs) with on-site implementation of corrective actions and provided hands-on support through workshops, in-depth technical support programs & training sessions on ESG. Our goal is not only to mitigate environmental risks but also to empower our suppliers to adopt more sustainable operations and align with Tata AutoComp's ESG objectives.

To assist our suppliers in enhancing their business and ESG performance, Tata AutoComp has developed a series of comprehensive supplier training programs. We provide suppliers with access to ESG benchmarks against peers. These programs are designed to educate and empower suppliers with the knowledge and tools needed to meet our business and sustainability expectations. Key programs include:

- **Utkarsh Program:** A 12-month development program by ACMA, targeting 24 “Grow” category suppliers. It conducts 2-day classroom training sessions with quarterly evaluations by the Central Purchase Team. ACMA provides training on hygiene, safety, quality, delivery, and inventory scheduling to Suppliers. BU Purchase Heads visits these suppliers 12 times a year for the progress review. The third edition of Utkarsh is planned to include guidance on CBAM & ESG parameters to build the ESG capabilities of the suppliers.
- **Kaushal Program:** It is a classroom training program held monthly for “Grow Category Suppliers”. It provides training on subjects related to product development, management principles (Lean Six Sigma, Kaizen, PPAP, FMEA, and other quality improvement methodologies). The cost of this training program is covered by Tata AutoComp. The participants of the program are evaluated at the end of the session.
- **Supplier ESG workshop:** A comprehensive ESG training workshop was conducted for all TLE suppliers with the help of BU Purchase Heads prior to their ESG self-assessment phase. This workshop aims to guide suppliers through the process of completing the questionnaire, offering detailed instructions on how to accurately fill out and report their ESG data. One workshop was conducted in this financial year, and based on the action plan, similar workshops are being scheduled for the future.

#### 1.7.5. KPIs for Supplier Screening

A responsible and resilient supply chain is critical to our long-term success, and we place strong emphasis on a robust supplier screening and assessment process to ensure our partners align with our values and standards. The procurement journey for any new partner begins with a comprehensive screening process. A key component of this initial evaluation is a mandatory assessment of their Environment, Health, and Safety (EHS) compliance to ensure they meet our baseline sustainability and safety standards before being onboard.

For our significant suppliers, we conduct a more focused ESG Supply Chain Assessment to evaluate their performance on key Environmental, Social, and Governance parameters. We identify these critical partners based on their business relevance, using criteria such as procurement value, customer preference, and product substitutability. This multi-faceted evaluation of both ESG performance and business criticality helps us manage risk and build a supply chain that is not only efficient but also ethical and sustainable.

##### Numbers of Supplier Screening

Particulars	UoM	FY 2024-25
Total number of Tier 1 suppliers	Number	458
Total number of significant Tier 1 suppliers	Number	80
Percentage of total spend on significant suppliers in Tier 1	Percentage	81.25
Total number of significant non-Tier 1 suppliers	Number	0
<b>Total number of significant suppliers (Tier 1 and non-Tier 1)</b>	Number	<b>80.0</b>

#### 1.7.6. KPIs for Supplier Assessment and/or Development

Our commitment to a responsible value chain is supported by a formal process of supplier assessment and development. We evaluate critical suppliers through an ESG Supply Chain

Assessment. Based on these results, we provide partners with tailored corrective action plans and support their growth through dedicated ESG workshops and training. For more intensive capacity building, we offer flagship initiatives like the Utkarsh Program, developed with the Automotive Component Manufacturers Association (ACMA), and the Kaushal Program to enhance suppliers' technical competencies.

#### Supplier Assessment and Development

Particulars	UoM	FY 2024-25	Target for FY 2024-25
Total number of suppliers assessed via desk assessment/ on-site assessments	Number	65	100% of significant suppliers
% of unique significant suppliers assessed	Percentage	81.25	-
Number of suppliers assessed with substantial actual/ potential negative impacts	Number	20	-
% of suppliers with substantial actual/potential negative impacts with agreed corrective action/improvement plan	Percentage	100	-
Number of suppliers with substantial actual/potential negative impacts that were terminated	Number	0	-

Corrective Action plan support	UoM	FY 2024-25	Target for FY 2024-25
Total number of suppliers supported in corrective action plan implementation	Number	20	20
% of suppliers assessed with substantial actual/potential negative impacts supported in corrective action plan implementation	Percentage	100	-

Capacity Building Programs	UoM	FY 2024-25	Target for FY 2024-25
Total number of suppliers in capacity building program	Number	39	80
% of unique significant suppliers in capacity building programs	Percentage	48.75	-

#### 1.7.7. Conflict Minerals

We are committed to maintaining an ethical and responsible supply chain, ensuring that the materials used in our products do not contribute to human rights abuses. Our strategy for managing conflict minerals is integrated directly into our core supplier governance documents, including our Sustainability Guidelines for Suppliers and Responsible Value Chain Partner Code of Conduct.

These guidelines explicitly require our suppliers to ensure that any material used in their products do not directly or indirectly finance or benefit armed groups in conflict-affected and high-risk areas. Our due diligence process involves identifying the necessity of these minerals in our products, conducting supplier surveys to assess their origin and chain of custody, and verifying their responses and due diligence measures to ensure compliance with our ethical sourcing standards. This integrated approach is a key part of our broader commitment to upholding human rights throughout our value chain.

Read our Sustainability Guidelines for Suppliers [here](#).

Read our Responsible Value Chain Partner Code of Conduct [here](#).

## 1.8. Tax Strategy

### 1.8.1. Tax Strategy and Governance

We ensure full compliance with all applicable tax laws and regulations. We have a robust tax strategy in place that is embedded within our broader governance and compliance framework. We formally disclose key business, financial, and tax-related information for each tax jurisdiction in which we operate. This comprehensive disclosure includes the names of all resident entities, their primary activities, the number of employees, revenue, profit (or loss) before tax, income tax accrued for the current year, and income tax paid.

Our internal practices are designed to ensure transparency, integrity, and alignment with applicable tax laws across jurisdictions. The strategy is guided by principles of responsible tax behavior, with oversight from senior management and the Board, and ensures that tax-related decisions support the long-term sustainability and ethical conduct of our business.

We are committed to responsible tax practices that align with our values of transparency, integrity, and sustainability. Specifically:

- We do not transfer value created to low-tax jurisdictions.
- We do not engage in tax structures that lack commercial substance.
- We ensure that all transfer pricing is conducted in accordance with the arm's length principle.
- We do not use secrecy jurisdictions or so-called tax havens for tax avoidance.
- Our tax policy is subject to approval by the Board of Directors, ensuring alignment with our overall corporate governance framework.

Read our Tax Policy [here](#)

### 1.8.2. Tax Reporting

Tata AutoComp publicly reports on key business, financial and tax information for each tax jurisdiction. We formally disclose key business, financial, and tax-related information for each tax jurisdiction in which we operate. This comprehensive disclosure includes the names of all resident entities, their primary activities, the number of employees, revenue, profit (or loss) before tax, income tax accrued for the current year, and income tax paid.

Read more in our Annual Report [here](#).

### 1.8.3. Effective Tax Rate

Our approach to taxation is rooted in the principles of transparency, integrity, and responsible corporate citizenship, guided by our formal Tax Policy. We are committed to full compliance with all applicable tax laws in the jurisdictions where we operate, ensuring timely payments and maintaining ethical conduct with tax authorities. We view our tax contributions as an essential part of our social responsibility and integral to the development of the communities we serve.

## Taxes Paid

Financial Reporting	UoM	FY 2023-24	FY 2024-25
Earnings before (A)	INR	9,959,247,490	7,112,719,000
Reported Taxes (B)	INR	2,356,674,988	1,499,619,000
Cash Taxes Paid (C)	INR	2,403,382,000	1,447,708,000

## Cumulative acceptable adjustments

Financial Reporting	UoM	FY 2023-24	FY 2024-25	Calculated average rate
Effective Tax Rate (B/A)	%	23.6%	21.08%	22.58%
Cash Taxes Rate (C/A)	%	24.13%	20.35%	22.55%

## 1.9. Information Security

### 1.9.1. Information Security Governance

We have embraced industry-leading practices to establish a comprehensive, risk-based cybersecurity framework designed to proactively detect and respond to threats, safeguarding our critical assets. Tata AutoComp has established a dedicated risk management board-level committee with clear and defined responsibilities & IT background for overseeing information security. This reflects our commitment to robust governance and the protection of critical data assets across the organization.

Under the guidance of our Chief Information Officer (CIO), we conduct regular cybersecurity training sessions to elevate employee awareness of data privacy. We ensure that all employees have access to our Information Security Policy, which outlines essential guidelines for data handling and management. We place strong emphasis on continuous awareness and have implemented a straightforward process for reporting any suspicious activity.

To ensure resilience, we maintain rigorously tested business continuity plans and incident response procedures, conducting regular vulnerability assessments and penetration tests to identify and address system weaknesses, thus fortifying our defenses. Our dedication to maintaining high standards is evidenced by our 100% compliance with ISO 27001:2022 certification and the annual external audits of our IT infrastructure and information security management systems.

Tata AutoComp extends its commitment to cybersecurity beyond internal operations by educating and training our staff while also requiring our suppliers to uphold equivalent standards of data privacy. We have developed a formalized Information Security, Cybersecurity, Privacy Protection and Information Security Management System (ISMS) Handbook for Suppliers, encompassing key topics such as anti-malware, cloud security, and cryptography, to ensure a unified approach to data security across our business operations.

### 1.9.2. Information Security Policy

Our company is firmly committed to safeguarding information through a comprehensive and evolving Information Security Policy. This includes a continuous improvement approach to our

security systems, ensuring the integrity and protection of all data, and actively monitoring and responding to emerging threats. We assign clear individual responsibilities for information security across the entire workforce and establish stringent security requirements for third parties, including suppliers, to maintain a secure and resilient information ecosystem.

Read our Information and Cybersecurity Policy [here](#).

### **1.9.3. Information Security Management Programs**

Tata AutoComp has adopted industry-leading practices to build a robust, risk-based cybersecurity framework that proactively detects and responds to threats, ensuring the protection of critical assets. Led by our Chief Information Officer (CIO), we conduct regular training sessions to enhance employee awareness of data privacy and security. All employees have access to our Information Security Policy, which outlines key guidelines for data handling and a clear escalation process for employees to report incidents, vulnerabilities, or suspicious activities.

Our data privacy practices emphasize the protection of individuals' personal data, focusing on ethical collection, secure storage, and controlled use of the data. Our key Data Privacy practices include implementing "privacy by design," minimizing data collection, and using strong security measures like encryption and access controls.

To ensure operational resilience, we maintain rigorously tested business continuity and incident response plans. Regular vulnerability assessments and penetration tests help us identify and address system weaknesses, reinforcing our defenses. Our commitment to excellence is reflected in our regular internal audits, 100% compliance with ISO 27001:2022 through annual external audits of our IT infrastructure and security systems. An established escalation process enables employees to report incidents, vulnerabilities, or suspicious activities promptly. We also ensure that all employees receive regular information security awareness training. Notably, we are proud to report that there were zero information security breaches in FY 2024-25.

Beyond internal operations, we extend our cybersecurity standards to our suppliers. We provide a comprehensive ISMS Handbook for suppliers, covering essential topics such as Information Security, Cybersecurity, Privacy Protection, anti-malware, cloud security, and cryptography. Third-party risk management practices ensure a unified and secure approach to data protection across our value chain.

## **1.10. Product Quality and Recall Management**

### **1.10.1. Product Quality Programs**

Tata AutoComp has well-established programs to ensure the quality of its products. Each Business Unit (BU) has a dedicated quality assurance team responsible for inspecting products before they are forwarded, a process to prevent defective products before delivering them to customers to avoid product recalls, while Tata AutoComp Supply Chain Solutions (TSS), which manages the supply chain between BUs and customers, conducts an additional round of quality checks. These layered processes have helped us maintain high standards and avoid

any product recalls over the past four financial years. Regular internal audits and external audits are conducted to assess the effectiveness of our quality management systems. All manufacturing BUs are certified under ISO 9001:2015 standards, and every BU is also IATF certified, demonstrating our commitment to global quality benchmarks. To ensure continuous improvement, we mandate training for internal stakeholders on their roles within the quality management system. Additionally, we have established mechanisms for external stakeholders to raise concerns or complaints about product quality, which are addressed by our BU Independent Aftermarket team.

*Refer to our IATF certificates in the Annexures of this Factbook.*

### 1.10.2. Warranty Provisions

At our company, product quality and reliability are at the core of our value proposition. We have comprehensive warranty provisions in place, reflecting our commitment to customer satisfaction, loyalty, and long-term brand performance.

#### Warranty Provisions (INR)

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Provision warranty balance at the beginning of the period	INR	6,826,000	33,095,000	98,844,355	149,319,918.58
Warranty payments made during the period	INR	26,269,000	65,749,355	53,417,563	9,094,026.64
Revenues (as provided in the Company Information section)	INR	29,121,115,610	56,829,517,850	54,459,409,000	39,588,646,000
Cost of warranty payments as a percentage of actual revenues	%	0.09	0.11	0.09	0.02

### 1.10.3. Product Recalls

We place the highest priority on delivering safe, reliable, and high-quality products to its customers. As a testament to the effectiveness of our quality assurance processes and robust supply chain checks, we have not experienced any product recalls in the past four financial years. This track record reflects our proactive approach to quality control, which includes multiple layers of inspection across Business Units.

#### Product Recalls

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Number of vehicles recalled	Number	0	0	0	0
Expenses incurred due to recalls issued in the corresponding fiscal year	INR	0	0	0	0
Number of vehicles recalled that were mandated	Number	0	0	0	0
Revenues (as provided in Company Information section)	INR	29,121,115,610	56,829,517,850	54,459,409,000	39,588,646,000
Cost of recalls as a percentage of annual revenues	INR	0	0	0	0

# 2. Environment

## 2.1. Environmental Policy & Management

### 2.1.1. Environmental Policy

Our comprehensive Environment Policy is designed to ensure the effective implementation of a reliable and robust Environmental Management System (EMS) and reduce our environmental footprint. This Policy underscores our dedication to complying with all relevant environmental laws and regulations, demonstrating our commitment to legal and ethical environmental stewardship. We also have a Sustainability Policy in place to demonstrate our commitment to adopt sustainable business practices across all our operations. Both Policies are available publicly and apply to all our facilities, our business operations, suppliers, joint venture (JV) partners, and subsidiaries at all locations where we operate, as well as our corporate offices, employees, mergers and acquisitions, and business associates, including contractors and suppliers.

To ensure successful implementation of the Policy, we have set clear accountability of roles and responsibilities. A dedicated ESG Committee oversees and guides our sustainability initiatives. It oversees the planning, execution, and monitoring of sustainability initiatives, while regularly reporting to the Board and advising on ESG strategy. The Committee ensures compliance with national and international standards, tracks entity-level ESG performance, sets robust targets and objectives to reduce environmental impacts for ensuring continuous improvement of environmental performance and promotes awareness through training and capacity-building programs. It actively engages stakeholders and data owners, formulates actionable plans, and monitors progress to ensure that targets are achieved in a structured and sustainable manner. Additionally, it consults external stakeholders during the development, modification, and implementation of the Environment Policy.

The Policy is endorsed by a Board member, our chairman. The executive management oversees the progress and implementation of environmental strategies to achieve targets.

*Read our Environment Policy [here](#).*

*Read our Sustainability Policy [here](#).*

### 2.1.2. Environmental Management Systems Verification

All our locations adhere to relevant national and global regulations, with each business unit implementing an Environmental Management System (EMS) certified under ISO 14001:2015. These systems are further validated through assessments conducted by independent third-party experts. 100% of our manufacturing sites are ISO 14001:2015 certified.

**Coverage of EMS**

Certification/Audit/Verification	UoM	Coverage (%)
EMS is verified through international standards (e.g. ISO 14001, JIS Q 14001, EMAS certification)	%	100
Third party certification / audit / verification by specialized companies.	%	-
Internal certification / audit / verification by company's own specialists from headquarters.	%	-
Total	%	100

Tata AutoComp Systems Limited is having 6 entities - Tata AutoComp Systems Interiors & Plastic Division (IPD), Tata AutoComp Gotion Green Energy Solutions, Tata AutoComp Systems Composites Division (CD), Tata AutoComp Systems Supply Chain Solutions (TSS), Tata AutoComp Systems Technical Centre (TTC), Independent Aftermarket (IAM). Among which all the manufacturing entities i.e., Tata AutoComp Systems Ltd - EV (Tata AutoComp Gotion Green Energy Solutions) division certified by ISO 14001:2015, and Tata AutoComp Systems Composites Division (CD) certified by ISO 14001:2015 and Tata AutoComp Systems Interiors & Plastic Division (IPD) certified by ISO 14001:2015.

Refer to our ISO 14001 certificates in the Annexures of this Factbook.

### 2.1.3. Environmental Violations

During the past four fiscal years, there have been no environmental violations at any of our operations, exceeding USD 10,000, and we have not paid any significant fines related to environmental or ecological issues for our operations.

#### Environmental violations

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Number of violations of legal obligations/regulations	Number	0	0	0	0
Amount of fines/penalties related to the above	Number	0	0	0	0

## 2.2. Energy

### 2.2.1. Energy Management Programs

Energy management is central to our sustainability strategy. We aim to reduce our environmental footprint by improving energy efficiency, transitioning to renewable sources, and embedding energy-conscious practices across our operations.

Our annual objective is to reduce overall energy consumption by 5%, supported by a structured Energy Management System (EnMS), internal and external audits, and real-time monitoring. Our short-term quantified target is to source 20% of electricity from renewables by 2026, with a long-term ambition to achieve 100% renewable electricity by 2030. These efforts are aligned with our broader climate goals and contribute to producing low-carbon products and mitigating climate-related risks.

We ensure to conduct regular internal and external audits to ensure continuous compliance with our energy management protocols.

Tata AutoComp is actively advancing its clean energy portfolio by exploring group captive solar and wind power arrangements. The company generated approximately half a million units annually through rooftop solar installations by FY 2024–25. To further enhance energy efficiency and reduce consumption, automation technologies and smart lighting systems have been integrated across operations. In FY 2024–25, Tata AutoComp consumed 5.8 million units (MU) of renewable electricity, added 418 kWp to its rooftop solar capacity, and achieved a reduction of 4,190 MTCO<sub>2</sub>e through renewable energy use.

Our efforts and investments in innovation and Research and Development (R&D) have resulted in development of a low-density product that contributes to reduced carbon intensity throughout the product life cycle. We have transitioned to using more energy-efficient electric tools to lower energy consumption. We also manufacture lithium-ion Battery Energy Storage Systems (BESS). These systems support Tata Power’s renewable energy infrastructure and contribute to India’s clean energy transition.

A structured energy efficiency training is provided to all employees to enhance their awareness of energy consumption; reduction measures and practices followed throughout the Company.

Read more in our Sustainability Report [here](#).

### 2.2.2. Energy Consumption

We have taken various initiatives to ensure energy efficiency and savings to reduce our footprint. We have also actively invested in renewable energy to reduce our reliance on non-renewable energy.

#### Energy Consumption (MWh)

Total Energy Consumption	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25	Target for FY 2024-25
Total Non-Renewable Energy	MWh	27,037	32,194	39,665	32,508	35,000
Total Renewable Energy	MWh	2,193	2,188	5,027	5,763	-
Data coverage (as percentage of operations)	Percentage of operations	100	100	100	100	-

## 2.3. Waste & Pollutants

### 2.3.1. Waste Management Programs

At Tata AutoComp, we are committed to minimizing our environmental footprint through proactive and innovative waste management practices. Our approach is rooted in data-driven assessments, strategic planning, and continuous improvement. By conducting regular waste audits, implementing targeted action plans, and engaging employees across all levels, we strive to reduce waste generation, enhance resource efficiency, and move steadily toward our long-term goal of achieving Zero Waste to Landfill by 2030.

We carry out waste audits to identify opportunities for improving waste performance across our operations. These audits have helped us assess material flows, measure efficiency and form focused strategies to reduce waste.

We implement action plans to manage waste and reduce overall waste generation. This is achieved through process optimization and operational initiatives. One of the initiatives aimed at reducing hazardous waste generation through strategic process improvements and employee engagement. By analyzing production processes, we identified key areas where

waste could be reduced. This involved upgrading equipment and adopting more efficient technologies that produce less waste. Other operational initiatives included replacing polypropylene boxes with trolleys for product distribution, replacing polybags with rexin bags, and diverting sheet molding compound scrap from landfill as alternative fuels in cement industry.

We have established quantified targets to minimize waste. We have a long-term target to achieve Zero Waste to Landfill by 2030. To achieve our targets, we are initiating an engagement with a third-party to create a waste management plan by conducting a waste risk assessment.

Tata AutoComp invests in innovation and R&D to minimize our waste. We have partnered with Ellen MacArthur Foundation (EAF) to foster a shared understanding of cutting-edge Circular Economy (CE) concepts. We have successfully ensured that 100% of our critical waste was recycled/reused. Moreover, waste reduction training is also given to all our employees. This is done through a combination of offline and online trainings. During the year, employees and contractors participated in trainings to enhance their knowledge and understanding of waste management, handling and reduction.

### 2.3.2. Waste Disposal

Our waste management strategy is guided by our long-term commitment in line with Tata Aalingana goals to achieve Zero Waste to Landfill by 2030. Our approach focuses on circular economy principles, overall reduction in business, treating waste as a valuable resource, and embedding optimization directly into our manufacturing processes to reduce generation at the source.

For example, by improving processes and reusing recovered slurry in our Composites Division, we successfully reduced hazardous waste in that specific operation. These proactive source-reduction initiatives, combined with a focus on maximizing recycling and reuse, have been instrumental in our progress toward reducing waste disposal.

#### Waste Recycled and Disposed (MT)

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25	Target for FY 2024-25
Total waste recycled/reused	MT	1,525	3,601	2,704	3,227	-
Total waste disposed	MT	1,979	2,198	3,576	371	1,145
• Waste landfilled	MT	73	231	0	0	-
• Incineration with energy recovery	MT	185	100	100	0	-
• Incineration without energy recovery	MT	797	924	280	371	-
• Waste otherwise	MT	924	943	3,196	0	-

disposed (Third-party)						
• Waste with unknown disposal method	MT	0	0	0	0	-
Data Coverage	Percentage of operations	100	100	100	100	-

Read more in our Sustainability Report [here](#).

## 2.4. Water

### 2.4.1. Water Efficiency Management Programs

At Tata AutoComp, we actively identify opportunities for enhancing water efficiency. Our approach involves thorough evaluation of water usage to pinpoint areas for improvement and undertakes measures to curb excessive consumption. We have set specific water reduction targets, assigning clear responsibilities to ensure these goals are achieved. To achieve this, we have initiated a water use and risk assessment to ensure a robust baseline upon which we are able to make progress towards our targets.

A cornerstone of our sustainability strategy has been the implementation of an advanced water recycling initiative, which focuses on repurposing recycled water for non-potable uses such as landscape irrigation and gardening. Additionally, 6 of our plants have directly managed rainwater harvesting sites. This initiative not only reduces consumption of freshwater but also significantly reduces our environmental footprint.

To uphold environmental stewardship, Tata AutoComp has undertaken targets to reduce and replenish water consumption; water neutrality zero liquid discharge by 2030 and water-positive by 2040. We aspire to reduce domestic water consumption to less than 30 liters per person per day.

We have ensured effective application of water recycled for different purposes at our sites. Our sites are equipped with Sewage Treatment Plants (STPs) that effectively manage and recycle wastewater. We have established quality thresholds to ensure wastewater treated meets required standards. Additionally, rainwater harvesting systems have been implemented across various sites to efficiently capture and utilize rainwater, with separate drainage lines installed to prevent groundwater contamination.

To integrate our water recycling initiative into the organizational culture, we conduct comprehensive training programs to educate employees on water conservation, recycling processes, and their impact. This equips staff with the skills needed for active participation in water efficiency efforts, fostering a culture of conservation and responsibility.

### 2.4.2. Water Consumption

We recognize water as a precious, shared resource and are committed to a long-term goal of becoming water positive by replenishing more freshwater than we consume. Our strategy is focused on reducing consumption, maximizing reuse through advanced water recycling and a

commitment to Zero Liquid Discharge (ZLD), and expanding rainwater harvesting across our facilities.

**Freshwater Withdrawal and Consumption (million cubic meters)\***

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25	Target for FY 2024-25
A. Water withdrawal	Million cubic meters	0.136	0.169	0.165	0.155	-
B. Water discharge	Million cubic meters	0.016	0.020	0.021	0.038	-
Total net freshwater consumption (A-B)	Million cubic meters	0.120	0.149	0.144	0.116	0.125
Data Coverage	Percentage of operations	100	100	100	100	-

\* As part of our continuous improvement in data accuracy and transparency, we have refined our water data consolidation methodology thereby restating the water data.

## 2.5. Climate Strategy

### 2.5.1. Direct Greenhouse Gas Emissions (Scope 1)

Our Direct Scope 1 GHG emissions arise from fuel combustion and process-related activities, including fugitive emissions, within our operations. We have significantly expanded our operations due to anticipated future demand.

**Direct Emissions (Scope 1) (MTCO2e)**

Direct GHG (Scope 1)	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25	Target for FY 2024-25
Total direct GHG emissions (Scope 1)	MTCO2e	1,717	1,711	1,804	3,073	3,100
Data coverage	Percentage of operations	100	100	100	100	-

The Company's Scope 1 GHG data for FY 2024-25 is being verified by a third party.

### 2.5.2. Indirect Greenhouse Gas Emissions (Scope 2)

Our Indirect Scope 2 GHG emissions arise from electricity sourced from the grid, which we are actively managing by improving energy efficiency and expanding our energy consumption from renewable energy sources. This has enabled us to reduce our Scope 2 emissions despite an increase in our overall energy consumption.

**Indirect emissions (Scope 2) (MTCO2e)**

Indirect GHG (Scope 2)	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25	Target for FY 2024-25
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<b>Location-based</b>						
Total direct GHG emissions (Scope 2)	MTCO2e	18,539	24,023	28,438	23,633	25,000
<b>Market-based</b>						
Total direct GHG emissions (Scope 2)	MTCO2e	18,539	24,023	28,438	23,633	25,000
Data coverage (as a % of operations)	Percentage of operations	100	100	100	100	

We do not use any market-based instruments hence our market-based scope 2 emissions are equal to location-based Scope 2 emissions.

The Company's Scope 2 GHG data for FY 2024-25 is being verified by a third party.

### 2.5.3. Indirect Greenhouse Gas Emissions (Scope 3)

Our Indirect Scope 3 GHG emissions encompasses wider value chain, covering activities such as raw material procurement, transportation and end-use of products.

#### Total Scope 3 emissions (MTCO2e)

Indirect GHG (Scope 3)	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25	Target for FY 2024-25
Total direct GHG emissions (Scope 3)	MTCO2e	129,897	236,495	244,470	221,299	235,000

#### Scope 3 emissions with category-wise breakdown (MTCO2e)

Scope 3 Category	Emissions in the reporting year (MTCO2e in FY 2024-25)	Emissions calculation methodology and exclusions
Category 1: Purchased goods and services	102,125	Spend-based method using emission factors from US EEIO database.
Category 2: Capital Goods	2,130	Spend-based method using emission factors from US EEIO database.
Category 3: Fuel and energy related activities	7,105	Average data method using emission factors from DEFRA 2025.
Category 4: Upstream transportation and distribution	9,540	Hybrid method using emission factors from IPCC, DEFRA and US EEIO database.
Category 5: Waste generated in operations	7	Waste-type method using emission factors from DEFRA 2025.
Category 6: Business travel	668	Hybrid method using emission factors from IPCC and US EEIO.
Category 7: Employee commuting	7,349	Hybrid method using emission factors from DEFRA 2025 and US EEIO.

Category 8: Upstream leased assets	-	Not applicable
Category 9: Downstream transportation and distribution	-	The costs related to transportation and distribution of sold products are borne by Tata AutoComp. These emissions are appropriately accounted for under Scope 3 Category 4.
Category 10: Processing of sold products	-	Not applicable
Category 11: Use of sold products	49,976	LCA-based method
Category 12: End of life treatment of sold products	42,398	LCA-based method
Category 13: Downstream leased assets	-	Not applicable
Category 14: Franchises	-	Not applicable
Category 15: Investments	-	Not applicable
<b>Total Scope 3</b>	<b>221,299</b>	

The Company's Scope 3 GHG data for FY 2024-25 is being verified by a third party.

#### 2.5.4. Climate Governance

At Tata AutoComp, the Board of Directors and executive management have oversight and management responsibility of climate-related issues. The Board of Directors annually review the Sustainability performance to ensure alignment with our Tata Aalingana goals.

##### **Board-level oversight:**

The ESG Committee is instrumental in aligning the group-level sustainability strategy with the ESG Ambition, overseeing the planning, implementation, and monitoring of sustainability initiatives in line with Tata Group's Project Aalingana objectives. With a keen focus on sustainability performance, the Committee provides recommendations on ESG Strategy. The Board brings together expertise in areas such as energy, finance, manufacturing and strategy enabling informed assessment of climate risks and opportunities. Climate-related issues are formally included in the Board's agenda, with dedicated discussions happening annually.

##### **Management responsibility:**

Tata AutoComp's sustainability governance is a structured three-tier system. At the highest level, Sustainability Navigators ensure alignment with the group's ESG Ambition, monitor sustainability performance, report findings to the Board of Directors, and provide recommendations for enhancing the ESG strategy. The next tier, Sustainability Drivers, design, plan, and implement sustainability initiatives to meet Project Aalingana's objectives, monitor entity-level ESG performance and compliance, ensure adherence to national and international standards, and promote uniform capacity building and ESG awareness across all entities. Finally, Sustainability Beacons develop and implement technical Standard Operating Procedures (SOPs), engage periodically with stakeholders and data owners, conduct training programs, and create action plans to monitor progress and achieve targets. The entity has established a robust monthly performance monitoring mechanism that enables the CEO and Board of Directors to oversee both financial and sustainability outcomes across the organization. At the core of this system is the ESG Scorecard, which tracks key sustainability indicators, including emissions, energy, water, waste, biodiversity, and progress against ESG targets, for each Business Division on a month-to-month basis. These divisional

scorecards are consolidated at the Corporate Head Office, where an overall performance score is generated to reflect the Company's integrated ESG standing. In parallel, a Corporate Balanced Scorecard is prepared, combining financial metrics, operational KPIs, and sustainability data. This comprehensive report, along with individual Business Division performance summaries, is shared with the CEO and Board of Directors. Based on their review, the leadership team provides targeted feedback and strategic guidance to each Business Unit, ensuring accountability and continuous improvement.

*Read more in our Climate Action Report [here](#).*

### 2.5.5. TCFD Disclosure

We have prepared the Climate Action Report which integrates the Task Force on Climate-Related Financial Disclosures (TCFD) framework and addressed the four pillars as recommended by the TCFD, which is publicly available. We have conducted a comprehensive Climate Risk Assessment (CRA) aligned with IFRS S2 (Climate-related disclosures based on TCFD) to identify and assess climate-related risks. This assessment evaluates vulnerabilities across assets and operations, addressing critical and material physical risks. Physical Risk Assessment covered 20 sites, ensuring comprehensive coverage of the organization's most material operational footprint, including core manufacturing sites and offices.

Our Climate Action Report (TCFD aligned) covers the following elements:

- **Governance:** This section details the governance structure in place to oversee the assessment and management of climate-related risks and opportunities.
- **Strategy:** This section details out the strategic approach adopted to managing climate-related risks by systematically identifying potential business vulnerabilities linked to climate change and evaluating the associated threats. This thorough technical analysis allows for the development of customized mitigation strategies, thereby strengthening Tata Autocomp Systems overall risk management framework.
- **Risk Management:** This section details out the processes for identifying and managing climate-related risks and their integration into the overall risk management framework.
- **Metrics and Targets:** This section contains the metrics and targets used to assess climate-related risks and opportunities in line with our strategy and risk management process. These include Scope 1, 2 and 3 GHG emissions, water and waste and their reduction targets.

*Read more in our Climate Action Report [here](#).*

## 2.5.6. Climate-Related Management Incentives

To ensure accountability and drive progress on our strategic sustainability goals, we have integrated key environmental and social metrics into our performance and incentive structures. This approach applies across various levels of the organization, from senior leadership to our wider employee base. By linking incentives to our sustainability commitments, we foster a culture of shared responsibility and align individual performance with our long-term vision.

### Climate-related Management Incentives

Particulars	Type of Incentive	Incentivized KPIs	Description
Chief Executive Officer	Monetary, Recognition	ESG Integration, Climate Resilience, Net-Zero Progress	Incentives are tied to achieving strategic metrics such as advancing towards our Net-Zero Emissions target by 2045, and 10% variable pay is associated with meeting 100% renewable energy commitments and embedding ESG principles across all operations. Rewards are awarded based on measurable improvements in sustainability performance and substantial progress in climate resilience initiatives.
Other Named Executive Officers	Monetary, Recognition	ESG Program Execution, Compliance Leadership, Target Achievement	Incentives focus on driving project Aalingana's sustainability targets, ensuring regulatory compliance, and leading cross-functional efforts to achieve net-zero and 100% RE goals. The Managing Director is rewarded for executing these strategic initiatives effectively and achieving defined sustainability benchmarks and compliance metrics.
Employees	Monetary, Recognition	GHG Emissions Inventorization, Decarbonization Roadmap Advancements	Incentives are linked to achieving specific targets such as GHG emissions Inventorization across Scopes 1, 2, and 3, implementing decarbonization roadmaps, and conducting lifecycle assessments to meet our environmental performance standards.
		Supplier ESG Risk Mitigation, Human Rights Compliance	Rewards are given for achieving targets related to ESG risk assessments in the supply chain, developing human rights and sustainable supply chain policies, and ensuring adherence to our sustainability commitments through tangible supplier performance improvements.
		Biodiversity Strategy Development, Risk Assessment Completion	Incentives for meeting defined targets in developing and deploying biodiversity strategies, conducting comprehensive risk assessments, and implementing mitigation plans at priority locations, aligning with our environmental stewardship goals under Project Aalingana.

### 2.5.7. Climate Risk Management

Tata AutoComp has a climate risk management process that is integrated into multi-disciplinary Company-wide risk management processes. This includes a documented process where climate change risks and opportunities are identified and managed alongside all other risks and opportunities that affect the Company.

We conducted climate risk assessment using credible scenarios from the IPCC and NGFS, representing both optimistic and severe climate futures across short (0-5 years), medium (5-10 years) and long-terms (10-25 years). Physical and transitional risks were evaluated across our operational sites (IPD, CD, Gotion, TSS, TTC, IAM and GO (Group office))

The physical risk assessment covered extreme heat and heavy precipitation under chronic risks and tropical cyclone and water stress under acute risks. The transition risks identified include carbon pricing, emerging regulation, growing EV market, scarcity of raw materials and adoption of climate technologies under current and emerging regulations, technology, legal, market and reputational risks.

Read more in our Climate Action Report [here](#).

### 2.5.8. Financial Risks of Climate Change

We recognize that managing climate-related risk is a core component of our business resilience and long-term strategy. We have conducted a formal Climate Risk Assessment across our major operational sites to identify and evaluate potential financial impacts from both current and future climate scenarios.

Our assessment focuses on two primary categories: transition risks, such as those from evolving regulations like carbon pricing, and physical risks stemming from the direct impacts of climate change. This proactive process allows us to embed climate considerations into our strategic planning and develop targeted mitigation actions.

#### Details of Financial Risks of Climate Change

Particulars	Brief description of the risk	Estimated financial implications	Average estimated time frame for financial implications of the risk	Estimated costs of actions (INR)
Risks driven by changes in regulation	With the anticipated rollout of carbon tax policies in India and a projected rise in carbon emission costs aligned with Europe's pricing model, Tata AutoComp is set to face increasing operational expenses. Carbon taxation may escalate to USD 816.74 per ton of CO <sub>2</sub> by 2050, as part of global climate action toward Net Zero targets. This will	INR 1,434,000,000	5 years	INR 1,626,000,000

	<p>significantly impact manufacturing processes involving high embodied carbon materials like metals and polymers. Both direct emissions from operations and indirect emissions from suppliers will attract higher charges, reshaping the Company's cost structure. These rising costs will affect profitability, especially in high-emission areas, prompting Tata AutoComp to adopt strategic measures to remain competitive and sustainable</p>			
<p>Risks driven by change in physical climate parameters or other climate-change related developments</p>	<p>With rising global temperatures under projected climate change scenarios, Tata AutoComp has assessed that extreme heat days (above 40°C) are expected to increase across its operating regions. Heat stress is therefore identified as a material climate-related risk for manufacturing operations. Increasing exposure to high temperatures over extended durations may lead to reduced worker productivity, higher absenteeism, and greater incidence of heat-related health concerns in the future. Prolonged heat events could also elevate energy demand for cooling, increase operating costs, and cause potential disruptions to production schedules and delivery timelines. At the value chain level, supplier operations may similarly be affected, creating compounding risks of delay and cost</p>	<p>INR 128,000,000</p>	<p>5 years</p>	<p>INR 99,291,280</p>

	escalation. Together, these risks have the potential to influence revenue stability, operational efficiency, and workforce well-being over the medium to long term.			
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Read more in our Climate Action Report [here](#).

### 2.5.9. Financial Opportunities Arising from Climate Change

We view the global transition to a low-carbon economy not just as a responsibility, but as a significant opportunity for innovation and growth. Our strategy is focused on supporting the future of clean mobility by developing and manufacturing key components for electric vehicles (EVs), including battery packs.

#### Details of Financial Opportunities Arising from Climate Change

Particulars	Brief description of the opportunity	Estimated positive financial implications	Average estimated time frame for the financial implications of the opportunity	Estimated costs of actions (INR)
Financial opportunities arising from Climate Change	Tata AutoComp sees the rising demand for EV auto components as a transformative opportunity to reshape the business and lead in sustainable mobility. Driven by climate goals, incentives, and consumer preference, the EV shift creates demand for lighter materials, advanced thermal systems, battery enclosures, and high-voltage connectors distinct from traditional ICE components. With expertise in polymer systems, thermal and acoustic solutions, and battery packaging, Tata AutoComp is well-positioned to meet these needs. This growth enables Tata AutoComp to diversify the customer base, enter new markets, and strengthen partnerships with OEMs and EV startups. It also fuels R&D investment, automation, and digitalization. Financially, EV growth supports higher volumes, better margins, and revenue stability. Strategically, it aligns with Tata AutoComp's sustainability goals and enhances the ESG profile. Embracing the EV revolution is not just expansion, it's a commitment to innovation, responsible growth, and long-term value creation	INR 140,309,000,000	5 years	INR 126,277,000,000

Read more in our Climate Action Report [here](#).

### 2.5.10. Climate-Related Scenario Analysis

To assess the resilience of our business strategy under climate-related uncertainties, we selected two contrasting scenarios. For physical risks, SSP1 (below 2°C, sustainable pathway) and SSP5 (above 2°C, fossil-fueled development) represent low- and high-warming futures aligned with IPCC goals. SSP1 reflects strong mitigation, while SSP5 illustrates delayed action and elevated risks. These scenarios align with strategic assumptions around asset resilience, supply continuity, and capital planning.

For transition risks, we used NGFS Current Policies (limited policy evolution) and NGFS Net Zero 2050 (stringent climate action) to enable us to stress test the consequences of delayed transition, to understand vulnerabilities in operations and supply chains in carbon-intensive practices and to identify areas of the business that may require transformational change to remain compliant and competitive.

#### Details of our Scenario Analysis conducted

Scenario Type	2° C or below	Above 2° C
Transition Scenario	NGFS Net Zero 2050	NGFS Current Policies
Physical Scenario	IPCC SSP1 2.6	IPCC SSP5 8.5

Read more in our Climate Action Report [here](#).

### 2.5.11. Physical Climate Risk Adaptation

We proactively manage our exposure to the physical impacts of climate change through a structured risk assessment process that covers our operational sites. Following our formal Climate Risk Assessments, we have developed context-specific adaptation strategies to enhance our long-term resilience. Our adaptation plans are tailored to each location's unique environmental context. Below are a few of the risks identified.

#### Heat Stress:

Rising extreme heat events may pose operational and workforce-related risks for Tata AutoComp, with potential impacts on employee health, productivity, and energy costs from cooling demand in the upcoming decades. To proactively address this risk, Tata AutoComp has identified the application of high-reflectance cool roof coatings across prioritized facilities. This initiative reflects a broader adaptation strategy aimed at enhancing resilience to intensifying heat stress. The application of cool roof coatings reduces thermal load on units, lowers indoor ambient temperatures, and thereby minimizes dependence on energy-intensive cooling systems. The estimated cost of these actions is approximately INR 99.29 million.

#### Changing precipitation patterns:

For climate-induced heavy precipitation and associated flooding, Tata AutoComp has identified upgrading to parametric flood insurance as a key adaptive measure. This option has been considered because it ensures rapid disbursement of funds following pre-defined flood triggers, thereby reducing delays associated with traditional indemnity-based claims and supporting uninterrupted business continuity. The potential investment in parametric cover is therefore evaluated not only as a financial cost but also as a resilience-enhancing measure

that safeguards operations and stakeholders. The estimated cost of these actions is approximately INR 36.6 million.

Our physical risk adaptation plan covers 100% of our existing operational sites and adaptation measures are to be implemented in less than 5 years.

We have conducted risk management for all our existing operations, and no new assets have been planned.

*Read more in our Climate Action Report [here](#).*

### 2.5.12. Emissions Reduction Targets

In line with our long-term Net-Zero ambition, we have established clear interim targets to drive immediate action on decarbonization. As part of our commitment to transparent reporting, our emissions baseline was recalculated for the year 2020 following a recent business restructuring to accurately reflect our current operational boundaries.

Measured against this updated baseline, we are committed to achieving a 25% absolute reduction in our Scope 1 and 2 GHG emissions by 2030. This target is to be validated by the Science-based Targets initiative (SBTi) in the coming years.

#### Emission Reduction Targets

Target type and metric	Scope covered by Target	Base Year & Target Timeframe	Baseline year emissions covered and as a percentage of total base year emissions	% reduction target from base year
Absolute Target	Scope 1 & 2	Base Year: 2020 Target Year: 2030	100% of Base Year Emissions of 7,648 MT CO <sub>2</sub> e	25% reduction from base year

*Read more in our Climate Action Report [here](#).*

### 2.5.13. Internal Carbon Pricing

Tata AutoComp is proactively preparing to comply with anticipated carbon pricing regulations by leveraging its internal carbon pricing strategy as a foundational tool for climate-aligned decision-making. We have calculated our internal carbon price using a shadow pricing methodology that reflects the cost of procuring Renewable Electricity Certificates (RECs), which are the most appropriate proxy given the predominance of Scope 2 emissions in our carbon footprint.

The calculation involves averaging the REC procurement cost across operational sites and converting this into a per MTCO<sub>2</sub>e value using standardized grid emission factors. For FY 2024-25, this resulted in a shadow price of INR 371.39 per MTCO<sub>2</sub>e. This price is applied to evaluate the financial impact of energy-related decisions, prioritize renewable electricity procurement, and guide operational planning. The approach is aligned with Tata AutoComp's

internal pricing guidance and reviewed annually to reflect changes in REC market rates, regulatory developments, and progress against our Net Zero Roadmap.

Our strategy focuses on embedding carbon cost signals into key business processes, including energy procurement, facility-level efficiency initiatives, and capital investment planning. By monitoring REC market trends and analyzing electricity consumption across sites, we assess how the internal price influences behavior and drives low-carbon transitions, particularly for Scope 2 emissions.

**Internal Carbon Price**

GHG Scopes covered	Type of Internal Carbon Price	Application	Internal Carbon Price (INR/MTCO2e)	Objectives to implement ICP
Scope 1 and 2	Shadow price	All business decision-making processes	INR 371.39	We utilize an internal price on carbon as a key strategic tool to embed climate considerations across our operations and investment decisions. This mechanism is instrumental in conducting cost-benefit analyses, driving energy efficiency, and steering investments toward low-carbon solutions and opportunities. By assigning a monetary value to emissions, we actively incentivize the integration of climate-related factors into our decision-making, risk assessment processes, and long-term financial planning. This approach is fundamental to setting and achieving our climate-related policies and targets.

**2.5.14. Net Zero Commitment**

Tata AutoComp is committed to achieving net-zero greenhouse gas (GHG) emissions across our entire value chain by 2045. This commitment is sought to be validated by the Science Based Targets initiative (SBTi) in the coming few years. This ambition is a core component of our business resilience strategy and is aligned with the Tata Group's transformative "Project Aalingana" initiative. Our commitment is guided by our Sustainability Policy, which includes setting science-based targets, and is overseen at the highest level by our ESG Committee and Board of Directors to ensure accountability.

Our strategy is firmly focused on direct emission reduction through a clear Decarbonization Roadmap, rather than relying on future offsets.

Scopes 1 & 2 (Our Operations): We are actively implementing programs to reduce our direct carbon footprint. Key initiatives include operating entirely coal-free across all manufacturing locations, significantly increasing our use of renewable electricity through on-site solar projects, and transitioning our backup power systems to cleaner hybrid configurations.

Scope 3 (Our Value Chain): Recognizing that the largest portion of our emissions lies within our value chain, our focus has shifted from measurement to meaningful action. We are deepening our engagement with key suppliers through a sustainable supply chain assessment to improve data quality and implement targeted reduction initiatives in our most significant emissions categories.

**Details of our Net Zero Commitment**

Base Year	Target Year	Target scope & related emission reduction target
2023	2045	Tata AutoComp Systems Limited commits to reduce Scope 1, 2 and 3 GHG emissions 100% by 2045 from a 2023 base year.

Read more in our Climate Action Report [here](#).

## 2.6. Biodiversity

### 2.6.1. Biodiversity Risk Assessment

Tata AutoComp has a Biodiversity Impact Assessment Framework structured and designed to guide businesses in identifying, assessing, and managing their dependencies, impacts and risks on biodiversity. In line with our Biodiversity Policy and Biodiversity Impact Assessment Framework, we screened direct operations to identify, assess, and manage potential impacts on biodiversity.

#### Process Description

- The Company has publicly reported on the process steps of its biodiversity risk assessment in the Sustainability Report
- The Company has used location-specific approach
- The Company has used the below methodology for the assessment
- Integrated into multi-disciplinary company-wide risk management processes
- The Company has identified dependency and impact related biodiversity risks

#### Methodology for Biodiversity Risk Assessment:

- **Biodiversity Proximity and Sensitivity Analysis:** By utilizing geospatial tools such as Google Earth Pro, GIS software and geospatial databases, the Company analyzed the proximity and sensitivity of business operations to important biodiversity areas, such as Wildlife Sanctuaries, Protected Areas (PAs), Key Biodiversity Areas (KBAs), Tiger Corridors (TCs) and presence of species listed on the IUCN Red List within a 10 km radius of our operations.
- **Dependency and Impact Identification:** At both the sectoral and site levels, the Company identified the potential dependencies and impacts on ecosystem services using screening tools such as the ENCORE and the WWF Biodiversity Risk Filter. These tools provide valuable insights into how our business sectors depend on ecosystem services and how our activities, in turn, affect local ecosystems.
- **Risk Mitigation Strategy Development:** The Company is committed to developing comprehensive risk mitigation strategies to address identified nature

risks at both the corporate and site levels. For sites identified as high priority, the framework recommends developing a detailed Site-Level Biodiversity Management Plan (BMP) that includes biodiversity assessment, ecological and social relevance analysis, impact assessment, mitigation strategies, budgeting, and an implementation plan.

The assessment was further strengthened by the use of TNFD recommended tools, including:

- WWF Biodiversity Risk Filter – to evaluate biodiversity risk at the site-level;
- ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure) – to screen sector-specific dependencies and impacts;
- Google Earth Pro and QGIS for GIS-based Spatial Analysis – to measure and understand site sensitivity and proximity to biodiversity sensitive areas.

This comprehensive approach not only helps businesses manage their biodiversity impacts effectively but also fosters continuous improvement and integration of biodiversity considerations into core business processes.

#### **Scope of Biodiversity Risk Assessment**

The scope of Company's biodiversity risk assessment covers our own operations, adjacent areas. Biodiversity Proximity and Sensitivity Analysis included 10 km radius buffer of operations to identify the proximity to key biodiversity areas, protected areas, Tiger Corridors (TCs), presence of species listed on the IUCN Red List.

#### **Risks Identified**

The company has identified biodiversity-related risks using the above-mentioned methodology.

*Read our Biodiversity Policy [here](#).*

*Read our Sustainability Report [here](#).*

### **2.6.2. Biodiversity Commitment**

The Company has a standalone Biodiversity Policy that underscores our commitment to preserving biodiversity. The Biodiversity Policy is aligned with the goals of the Convention on Biological Diversity (CBD) and national and international industry standards. Our Policy integrates conservation and management of biodiversity into our business strategy, establishing principles for a sustainable business model that positively interacts with nature. This reflects our ongoing commitment to ensuring alignment with operational and strategic goals, offering strategic insights into future disclosures.

The Policy outlines a commitment to achieve Net Positive Impact (NPI) and clearly defined targets for priority areas to work towards no net loss. It applies a mitigation hierarchy to minimize adverse impacts and mandates biodiversity risk assessments across operations. Moreover, stakeholder engagement is a key component of our approach, ensuring collaborative efforts in biodiversity conservation.

#### **Scope of Policy**

The Policy applies to our own operations.

### Policy Endorsement

The Policy is endorsed by the Board of Directors and operationalized through Executive Management. The endorsement at the highest levels of governance ensures that biodiversity considerations are integrated into corporate strategy, decision-making, and performance monitoring.

Read our Biodiversity Policy [here](#).

### 2.6.3. No Deforestation Commitment

The Company has a standalone Biodiversity Policy that underscores our commitment to preserving biodiversity and preventing deforestation across our operations. We encourage afforestation initiatives and promote No Net Deforestation at all our sites of operation and supply chain over the period of time.

#### Scope of Commitment

Our commitment covers our own operations and suppliers.

### Policy Endorsement

The Policy is endorsed by the Board of Directors and operationalized through Executive Management. The endorsement at the highest levels of governance ensures that biodiversity considerations are integrated into corporate strategy, decision-making, and performance monitoring.

Read our Biodiversity Policy [here](#).

## 2.7. Product Stewardship

### 2.7.1. Life Cycle Assessment

We conducted Life Cycle Assessments (LCA) of 3 products to manage environmental impacts through entire life cycle of the components. This assessment process has enabled us to identify areas for improvement, reduce our environmental impact, and enhance product stewardship, ultimately benefiting both the environment and our stakeholders.

#### Details of our Life Cycle Assessment

Resource Use	Ecological Consequences	Human Health
Abiotic depletion (fossil fuels, minerals)	Acidification	Human toxicity
Land use	Dust & particulate matter	Ionizing radiation
Water depletion	Ecotoxicity	
	Eutrophication	
	Global warming	
	Ozone depletion	
	Photochemical ozone formation	
	Species richness	

Description of the Life Cycle Assessment approach	% of Total Products
We engaged a third party to conduct full Life Cycle Assessment (LCAs) of three major products across Tata AutoComp legal entity (TLE). Cradle to Grave analysis of Tractor Hood from Composites Division, Bumper from Interior & Plastic Division and Battery pack from Tata AutoComp Gotion, which were conducted covering 47% of Tata AutoComp's total production by revenue. The LCA was conducted accordance with ISO 14040:2006 and ISO 14044:2006 (Environmental Management – Life Cycle Assessment) guidelines following the ReCiPe Method.	47

### 2.7.2. Exposure to Hazardous Substances

Tata AutoComp assesses its exposure to hazardous substances in its products and conducts regular risk assessments on its product portfolio. We have established Standard Operating Procedures (SOPs)/Operating Control Procedures (OCP) such as the Hazard Identification and Risk Assessment SOP, the Hazardous Substances SOP and HSE Procedure Manual among others, which define the processes and controls for handling hazardous raw materials in compliance with Indian regulations.

Type of Substance	Regulatory classification of hazardous substances	% of revenue associated with products containing substances in this list
Substances classified as hazardous by a regulatory authority	Indian List of Hazardous and Toxic Chemicals	0

*\*We follow the Schedule 1, 2 and 3 which is a part of the Indian List of Hazardous and Toxic Chemicals as per the guidance of The Factories Act, 1948.*

While we do produce a limited number of hazardous raw materials, these are further processed within our manufacturing systems to ensure that no hazardousness remains in the final product. As a result, our products are safe for use, and neither our customers nor end consumers are exposed to hazardous substances. In line with our commitment to safety and compliance, we conducted third-party audits during the year to validate our practices and ensure alignment with the Indian List of Hazardous and Toxic Chemicals and applicable safety standards. These audits reinforce our proactive approach to risk management and product stewardship.

Moreover, we also follow RoHS and REACH guidelines and all our hazardous raw materials are tested and externally assured by a third-party. These audits are also aligned with Authorization List and Candidate List Proposed by European Chemical Agency (ECHA) and Restriction of the use of EU Hazardous Substances Directive.

Moreover, **100%** of products (in terms of revenue) have undergone risk assessment for its potential impact on human health and the environment.

### 2.7.3. Hazardous Substances Commitment

At Tata AutoComp, we are committed to reducing and phasing out hazardous substances from our operations and products. Our approach is guided by our adherence to the Reduction of Hazardous Substances (RoHS) guidelines, ensuring that all our products are safe,

compliant, and environmentally responsible. Moreover, our commitment to hazardous substances is embedded in the Company's Safety and Health Policy.

Our commitment covers all hazardous substances present in our product portfolio. We aim to ensure that 100% of the portfolio containing hazardous substances is included in our reduction and phase-out strategy. We regularly and transparently report on our progress toward meeting hazardous substance reduction targets, ensuring accountability and visibility across stakeholders. Moreover, we actively collaborate with industry associations and forums to identify and adopt viable substitutes for hazardous substances, promoting safer alternatives across the value chain. At every Business unit, we have a dedicated R&D team and budget specifically focused on developing and integrating substitute materials, enabling us to phase out hazardous substances effectively.

Additionally, we have set a clear target to double the use of recycled raw materials in our total input material, further supporting our sustainability goals.

Read our Safety and health Policy [here](#).

#### **2.7.4. End of Life Cycle Responsibility**

We supply our products to Original Equipment Manufacturers (OEMs) and the percentage of products recycled and reused is based on the practices adopted by the OEMs. Tata AutoComp Systems Ltd is practicing reuse, recycle and safe disposal of products as per the local compliance requirements under Extended Producer Responsibility (EPR). Hence the question is not applicable to Tata AutoComp.

#### **2.7.5. Revenues from Eco-Labeled Products**

Currently at Tata AutoComp does not have any eco-labelled products. But it does have Other sustainable products which is Gotion EV battery packs in the use phase of the vehicle.

Tata AutoComp is committed to enhancing resource efficiency through its innovative product offerings, particularly in the realm of Battery Packs for Electric Vehicles (EVs). Our products deliver significant resource efficiency benefits during their use phase like decreased energy consumption and GHG emissions reduction, primarily due to the enhanced energy density and efficiency of our battery packs. By enabling EVs to travel longer distances on a single charge, our battery packs contribute to decreased raw material consumption and pollution reduction, as fewer resources are needed over the vehicle's lifetime. The increased durability and longevity of our battery packs ensure extended product life cycles, reducing waste generation and the need for frequent replacements. Our advanced thermal management systems also contribute to decreased energy consumption, optimizing battery performance and efficiency.

### Revenues from eco-labelled products (INR)

Revenue	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Product certified with Type I eco-labels (ISO 14024)	INR	-	-	-	-
Products certified with single/multi attribute eco-labels	INR	-	-	-	-
Other sustainable products or services	INR	8,689,100,000	27,856,800,000	22,919,600,000	5,577,700,000
Total revenues from sustainable products or services	INR	8,689,100,000	27,856,800,000	22,919,600,000	5,577,700,000
Percentage of sustainable revenues	%	29.83	49.01	42.08	14.08

## 2.8. Sustainable Raw Materials

### 2.8.1. Raw Materials Policy

Tata AutoComp has a robust Sustainability Policy through which we strive to optimize resource use, minimize waste generation, and promote the efficient use of energy, water, and raw materials across our operations and value chain. This Policy serves as a guiding framework to embed sustainability into our core business practices.

Through the Policy, we also commit to minimizing the negative sustainability impacts of raw materials and increasing the use of recycled raw materials, thereby reducing our environmental footprint and supporting circular economy principles. These efforts are aimed at driving long-term ecological balance and operational efficiency.

The Sustainability Policy is endorsed by the Board, reflecting our leadership's commitment to responsible growth and environmental stewardship. It is regularly reviewed to ensure alignment with evolving global standards, stakeholder expectations, and regulatory requirements.

Read our Sustainability Policy [here](#).

### 2.8.2. Raw Material Programs

Tata AutoComp has implemented several Sustainable Raw Materials programs aimed at reducing environmental impact and promoting responsible sourcing. As part of these initiatives, we conduct various assessments to prioritize raw materials based on their sustainability footprint and actively work to increase the use of recycled material in our operations.

We have set a clear target to ensure 2x of recycled material in the total input material, reinforcing our commitment to circularity and resource efficiency. These efforts are aligned with our broader sustainability goals and help reduce dependency on virgin resources.

To support this transition, we have established training programs for the company's internal stakeholders, focusing on their roles and responsibilities related to sustainable raw materials. These sessions aim to build awareness, foster accountability, and ensure that sustainability principles are embedded across functions and decision-making processes. Through these combined efforts, Tata AutoComp continues to strengthen its approach to sustainable sourcing and contribute meaningfully to environmental stewardship across the value chain.

### 2.8.3. Plastic Raw Materials

As a manufacturer of automotive components, plastic is a key raw material in our products. We recognize our responsibility to manage our material footprint and are strategically focused on decoupling our growth from the consumption of virgin, non-renewable resources. Our approach is to progressively increase the share of recycled and responsibly sourced inputs in our manufacturing processes.

#### Details of our Plastic sourcing

Plastic materials in products	Amount of Plastic materials used (MT)	% of materials used that are recycled
Plastic materials in products	32,537	0

### 2.8.4. Metal Raw Materials

A range of metal raw materials, including steel, aluminum, and critical battery metals like lithium and cobalt, are essential to our manufacturing processes. In line with our circular economy goals, we are strategically focused on reducing our reliance on virgin-extracted materials and increasing the share of recycled content across our value chain. This approach conserves natural resources and reduces the embodied carbon in our products.

#### Details of our Metal sourcing

Metal Materials	Amount of metal used (MT)	% of materials used that are recycled
Aluminum	998	12.5
Cobalt	-	-
Copper	1,500	0
Iron/Steel	2,000	8.11
Nickel	-	-
Lithium	1,462	0
Titanium	-	-

## 3. Social

### 3.1. Labor Practices

#### 3.1.1. Labor Practices Commitment

At Tata AutoComp, we are deeply committed to upholding fair and ethical labor practices across our operations, contractors, and partners. Our approach is guided by our Board-approved Human Rights Policy and the Tata Code of Conduct, which ensure that every worker is treated with dignity and respect, and that their rights are protected throughout our value chain.

Our labor practices commitment includes paying a living wage that meets or exceeds cost-of-living benchmarks, ensuring equal remuneration for men and women, and providing paid annual leave through formal policies. We actively avoid excessive working hours, set maximum limits on working hours, and manage overtime to safeguard employee well-being. We have established minimum consultation and notice periods before any termination decisions, and notably, we have never conducted a mass termination in our history. These commitments are embedded not only in our own operations but also extend to our contractors and partners through our Human Rights Policy and Responsible Value Chain Partner Code of Conduct, reinforcing our dedication to creating a safe, equitable, and inclusive workplace throughout our value chain.

Through these comprehensive policies and practices, Tata AutoComp ensures that labor rights are respected and upheld across all facets of our business. We remain steadfast in our commitment to creating a workplace that values fairness, dignity, and long-term resilience for every worker in our ecosystem.

*Read our Human Rights Policy [here](#).*

*Read our Tata Code of Conduct [here](#).*

#### 3.1.2. Labor Practices Programs

At Tata AutoComp, we are deeply committed to fostering ethical labor practices and ensuring the welfare of our workforce. Our approach is anchored in our Board-approved Human Rights Policy and the Tata Code of Conduct, which guide our actions across all levels of employment. We strive not only for compliance with labor laws but also for leadership in advancing social justice, equity, and resilience in the workplace.

We have robust programs in place to manage our labor practices. We ensure adequate wages at or above cost-of-living benchmarks, a commitment reinforced through our collaboration with the ILO on 'Living Wages', Social Justice', and our 'Social Compact' initiative for our contractual workforce. Our CHRO is also a member of the governing council of ILO and International Organisation of Employers (IOE). We monitor working hours, including overtime management, and ensure employees are paid for overtime work in full compliance with applicable labor laws.

We regularly engage with workers' representatives through comprehensive Collective Bargaining Agreements and plant-level Employee Resource Groups to continuously improve working conditions. We routinely monitor the gender pay gap through formal benchmarking exercises to achieve equal remuneration for men and women.

Beyond legal compliance, we expand social protection coverage through comprehensive health insurance, parental leave policies, and digital wellness tools like the FUROFIT app. We also ensure that employees are able to take their paid annual leave entitlements through our formal Leave Policy.

To support long-term resilience and a just transition, we provide training and reskilling programs to mitigate the effects of industrial and climate transitions. For example, our Product and Technology Academy offers courses in EV Engineering, and our CSR programs include skilling youth in Electric Vehicles.

Through these integrated efforts, Tata AutoComp continues to uphold the highest standards of labor welfare, ensuring that our workforce is protected, empowered, and prepared for the future. We remain committed to creating a workplace that is fair, inclusive, and resilient in the face of evolving industrial and environmental challenges.

*Read our Human Rights Policy [here](#).*

*Read our Tata Code of Conduct [here](#).*

### **3.1.3. Discrimination & Harassment**

At Tata AutoComp, we are an equal opportunity employer committed to a workplace free from discrimination and harassment. Our approach is governed by our Non-Discrimination and Anti-Harassment Policy and the Tata Code of Conduct, which mandate a zero-tolerance stance. All employment decisions are based strictly on merit and potential, with no bias relating to caste, religion, race, gender identity, sexual orientation, or disability. To foster a respectful culture, we provide mandatory Prevention of Sexual Harassment (POSH) training to all employees. We have established a formal, confidential grievance redressal mechanism with a strict zero-retaliation Policy, accessible to all stakeholders, including employees and business partners. Each business unit has a dedicated Internal Complaints Committee (ICC) to ensure impartial investigation, which includes over 50% women and an external representative from an NGO. Proven misconduct leads to firm disciplinary action. For the highest level of accountability, all POSH cases are reported to the Board and reviewed monthly by the Group CHRO. The strength of this framework is reflected in our performance: there were **zero** reported incidents of discrimination or harassment in FY 2024-25.

*Read our Non-Discrimination and Anti-Harassment Policy [here](#).*

*Read our Tata Code of Conduct [here](#).*

### 3.1.4. Workforce Breakdown: Gender

We at Tata AutoComp are committed to fostering gender diversity by monitoring relevant indicators and setting measurable targets for increasing female participation in our workforce.

#### Workforce Breakdown by Gender

Diversity Indicator	UoM	FY 2024-25 (Percentage)	Public Target* (Percentage)	Target Year
Share of women in total workforce (as percentage of total workforce)	%	15.74	25	2030
Share of women in all management positions, including junior, middle and top management (as percentage of total management positions)	%	9.85	20	2030
Share of women in junior management positions, i.e. first level of management (as percentage of total junior management positions)	%	10.23	30	2030
Share of women in top management positions i.e. maximum two levels away from the CEO or comparable positions (as percentage of total top management positions)	%	5.13	15	2030
Share of women in management positions in revenue generating functions (as percentage of all such managers)	%	7.06	15	2030
Share of women in STEM-related positions (as percentage of total STEM positions)	%	14.73	20	2030

### 3.1.5. Workforce Breakdown: Race/ Ethnicity & Nationality

We monitor indicators relating to diversity in the nationality in our workforce. At Tata AutoComp, less than 20% of our workforce is based in the US with most of the workforce being present in India. Additionally, based on local laws, we do not track and discriminate based on caste and ethnicity – therefore, we are only able to report in terms of nationality.

#### Workforce Breakdown by Nationality (Percentage of total workforce)

Breakdown based on Nationality	Share in total workforce	Share in all management positions, including junior, middle and senior management
Indian	100%	100%

### 3.1.6. Gender Pay Indicators

We are committed to fair and equitable remuneration for all our employees, ensuring equal pay for equal work. This principle is a cornerstone of our Diversity, Equity, and Inclusion (DEI) strategy and is embedded in all our practices. To uphold this commitment, we conduct a formal benchmarking exercise on pay and compensation based on job role and gender. This structured analysis allows us to proactively monitor and address any potential disparities,

ensuring that all compensation decisions are based solely on performance, merit, and competence, not on gender.

**Gender Pay Indicators (Gender Pay Gap Analysis)**

Indicator	UoM	Difference between men and women employees (%)
Mean Gender Pay Gap	%	53
Median Gender Pay Gap	%	35
Mean Bonus Gap	%	51
Median Bonus Gap	%	21

**3.1.7. Freedom of Association**

We are committed to upholding the fundamental rights of our employees, including the freedom of association, which allows them to freely join or form labor unions and engage in collective activities. We recognize and respect the importance of this right as an essential component of a fair and equitable workplace. Currently, 15% of our employees are represented by an independent trade union or covered by a collective bargaining agreement.

**3.2. Human Rights**

**3.2.1. Human Rights Commitment**

We have a comprehensive Human Rights Policy in place which outlines the commitment of our Company ensuring the conformance to Human Rights and outlines Tata AutoComp’s is committed to developing a culture which inculcates respect and support for Human Rights and seeks to avoid connivance in Human Rights abuses. This Policy is in accordance with the principles of International Labor Organization and United Nations Global Compact. Our Policy covers the following aspects of commitment to prevent human trafficking, forced labor, child labor, ensure freedom of association, the right to collective bargaining, equal remuneration, discrimination, diversity and inclusion. The Policy covers requirements for our own operations (across our employees, contractors, products and services) as well as our suppliers and partners.

*Read our Human Rights Policy [here](#).*

**3.2.2. Human Rights Due Diligence Process**

We undertook a comprehensive Human Rights Due Diligence (HRDD) process in the past financial year to ensure adherence to global human rights standards and workplace where fairness, respect, and dignity are of highest priority for every employee which includes systematic risk identification and periodic review of potential human rights issues within our operations. We have also prepared a Human Rights Due Diligence Report.

As part of our human rights assessments, we evaluate actual or potential human rights risks, covering:

- Forced labor
- Human trafficking
- Child labor

- Freedom of association
- Right to collective bargaining
- Discrimination
- Equal remuneration

Stakeholder groups covered in our human rights due diligence process include our own employees, women, migrant workers, and third-party employees, ensuring a holistic and inclusive approach to human rights protection.

Read our Human Rights Policy [here](#).

Read more in our Sustainability Report [here](#).

Read more in our Human Rights Due Diligence [here](#).

### 3.2.3. Human Rights Assessment

We have conducted an assessment of potential human rights issues across our business activities in the past financial year.

#### Coverage of Human Rights Assessment and Risk Management (Percentage)\*

Category	UoM	A. % of total assessed in last three years	B. % of total assessed where risks have been identified	C. % of risk with mitigation actions taken
Own Operations (sites)	%	100	0	0
Contractors and Tier I Suppliers	%	95	0	0

\*Joint ventures are not relevant since our current sustainability disclosure boundaries don't consider our joint ventures

Read more in our Human Rights Due Diligence [here](#).

### 3.2.4. Human Rights Mitigation & Remediation

The Remediation and Mitigation Plan has been crafted to address any human rights concerns identified during the comprehensive HRDD process across nine functional areas at the Company's operational locations. This plan underscores the importance of remediation actions, which are essential for addressing and rectifying human rights violations and ensuring justice for victims.

#### Processes implemented to mitigate human rights risks

We have implemented processes to mitigate human rights risks across our operations. Such actions include legal redress, compensation, rehabilitation, and guarantees of non-repetition, all of which are critical for restoring dignity and trust within affected communities. The plan prioritizes the following issues:

- Workplace Facilities and Environment
- Discrimination
- Learning and Development
- Workplace Health and Safety

- Right to Privacy and Equal Remuneration
- Freedom of Association and Collective Bargaining
- Remediation Actions

A detailed set of mitigation measures have been planned for each of the above issues. These include undertaking immediate measures/actions, conducting training and workshops and promoting support systems.

*Number of sites with mitigation plans*

The HRDD process was conducted across our operations. Mitigation measures have been planned for all sites.

*Type of remediation actions taken*

When the assessment was conducted, no human rights issues were found. Hence, no remediation actions were taken. However, we have established remediation actions for human rights, which involve measures to address and rectify violations, ensuring justice for victims. These actions include legal redress, compensation, rehabilitation, and guarantees of non-repetition. They are crucial for restoring dignity and trust in affected communities. Such initiatives are important because they uphold the principles of accountability and justice, deterring future violations. They also promote healing and reconciliation, fostering a culture of respect for human rights. Ultimately, remediation actions contribute to building more just and equitable societies.

Read our Human Rights Policy [here](#).

Read more in our Sustainability Report [here](#).

Read more in our Human Rights Due Diligence [here](#).

### 3.3. Human Capital Management

#### 3.3.1. Training & Development Inputs

We are committed to the continuous professional growth of our employees, empowering them with the skills needed for a future-ready workforce. We measure our investment in capability building through key performance indicators, including the average training hours provided per employee.

*Average Hours and Spend for FTE Training and Development*

Particulars	UoM	FY 2024-25
Average hours per FTE of training and development	Hours	39.00
Average amount spent per FTE on training and development	INR	7,228.9

We also monitor average hours of training and average amount spent/FTE as per gender and management levels.

#### Average hours of training/FTE (breakdown by Gender)

Particulars	UoM	Average hours of training/FTE
Male	Hours	39.65
Female	Hours	38.15

#### Average hours of training/FTE (breakdown by Management Level)

Particulars	UoM	Average hours of training/FTE
Junior Management	Hours	39.60
Middle Management	Hours	39.95
Senior Management	Hours	37.62

#### Average amount spent /FTE (breakdown by Gender)

Particulars	UoM	Average amount spent (INR)
Male	INR	7,635.20
Female	INR	5,053.29

#### Average amount spent /FTE (breakdown by Management Level)

Particulars	UoM	Average amount spent (INR)
Junior Management	INR	4,389.05
Middle Management	INR	12,969.09
Senior Management	INR	11,683.04

### 3.3.2. Employee Development Programs

At Tata AutoComp, our people are our greatest asset and the driving force behind our long-term success. Employee development is a strategic priority, central to building a resilient, innovative, and future-ready workforce. We have implemented a holistic framework that empowers individuals throughout their career journeys.

This framework is delivered through structured programs such as our Learning Academies, which focus on cultivating leadership and digital capabilities, and flagship initiatives like the Social Compact, which promotes dignity and equity for our contractual workforce.

Our development approach includes a wide range of learning methods such as te, mentorship, and employee resource groups that foster networking and peer learning. We offer a diverse portfolio of programs covering leadership development, cultural education, and wellness practices, ensuring a well-rounded growth experience.

In addition, we offer a dedicated program to support employees approaching retirement, helping them transition smoothly into the next phase of life. This initiative focuses on preparing individuals emotionally, financially, and socially for retirement through structured guidance, resources, and counseling. Our digital transformation programs include trainings on newer technologies that equip employees with cutting-edge technological skills, enabling them to adapt to evolving business needs. These initiatives not only enhance individual competencies but also drive operational efficiency, innovation, and organizational agility.

This dual focus—on nurturing high-potential talent and uplifting our entire value chain—reflects our deep commitment to inclusive and sustainable growth. By investing in talent at

every level, we ensure our workforce remains engaged, future-ready, and aligned with the company's strategic vision. Following are some programs we have undertaken.

### **Program 1: Strategic Learning Academies**

Tata AutoComp's core employee development is structured around four dedicated Learning Academies: Management and Leadership Development, Operational Excellence, Product and Technology, and Linguistic and Cross-Cultural Engagement. These academies are designed to build a future-ready workforce by fostering a culture of continuous improvement and providing world-class learning opportunities through partnerships with institutions like IIM Nagpur and Warwick University.

#### *Learning Method:*

- Coaching or Mentorship: The leadership academies incorporate formal mentorship programs and reverse mentoring to accelerate the growth of high-potential talent.
- Teams and Networks: The Linguistic and Cross-Cultural Engagement Academy and programs like the Women Employees Network foster a collaborative environment, which is a key part of the development process.
- Digital Learning Platforms & Learning Management System (LMS) on SAP Success Factors: Through partnerships for digital learning platforms like LinkedIn Learning, Tata Tomorrow University, Webinar, e-modules etc. For employees and AR/VR based DOJO rooms (Skill Development Centers) for Shop floor workers, learning culture at Tata AutoComp has seen an acceleration with significant improvement in Learning Hours per employee.

#### *Type of Program:*

- Leadership Development Program: The Management and Leadership Development Academy offers flagship programs like "Leap Vault" and "Blue Mint (Tata Sons)" to nurture the next generation of leadership.
- Cultural Education: The Linguistic and Cross-Cultural Engagement Academy provides culture orientation sessions and foreign language courses to develop inclusivity.
- Digital Transition Program: The academies offer specific courses on Digital Manufacturing, AI and Machine Learning, and Cloud Technology, alongside training in Augmented/Virtual Reality in "DOJO" skill rooms.

#### *Business Impact:*

The strategic implementation of these academies and related talent initiatives has yielded significant quantitative impacts, including a 10% improvement in talent retention, a 44% reduction in employee turnover, and an increase in the employee satisfaction score to 90%.

#### *Coverage:*

The development framework is inclusive, with higher education partnership programs designed for employees across all categories.

### **Program 2: The "Social Compact" Initiative**

The "Social Compact" is a flagship initiative designed to extend dignity, equity, and inclusion to the informal workforce, including temporary and contractual workers. The program focuses on ensuring secure wages, health and social security, workplace safety, and access to

government entitlements, thereby enhancing the stability and wellbeing of this critical segment of the workforce.

*Learning Method:*

- Coaching or Mentorship: The initiative is implemented through "Social Compact Champions", a team of 30 certified internal members who conduct audits and drive improvements, acting as coaches for contractors and providing guidance to the informal workforce.
- Teams and Networks: The program strengthens the integration of the informal workforce into the Company's operational and safety culture, creating a more cohesive and supportive network for all workers.

*Type of Program:*

The program embeds a culture of equity and respect for the informal workforce. It includes workshops for contractors on legal compliance and for workers on their rights and entitlements, which is a form of foundational cultural and social education.

*Business Benefits:*

The primary business benefit is the creation of a more stable, secure, and resilient informal workforce. This fosters better supplier relationships, ensures adherence to legal and ethical standards across the value chain, and reduces operational risks associated with workforce instability.

*Coverage:*

This program specifically targets and covers contractual and part-time employees, as well as other informal workers in the Company's value chain.

**3.3.3. Human Capital Return on Investment**

We view our investment in human capital as a critical driver of long-term value. To measure the efficiency and effectiveness of our talent management programs, we track our Human Capital Return on Investment (HC ROI).

This key performance indicator helps us understand the value generated by our employees relative to the investment we make in their compensation, benefits, and development. By monitoring HC ROI, we can make more informed strategic decisions regarding our workforce, ensuring that our human capital programs are not only fostering a thriving work environment but also contributing directly to the company's productivity and financial success.

**Human Capital Return on Investment\***

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Total Revenue	INR	29,121,115,610	56,829,517,850	54,459,409,000	39,588,646,000
Total Operating Expenses	INR	24,652,535,360	49,209,324,600	46,164,178,399	33,825,408,000
Total Employees-	INR	2,102,957,708	3,074,443,000	3,193,476,000	3,729,561,000

related expenses					
Resulting HC ROI	Percentage	3.12	3.47	3.59	2.54
Total Employees	Number	5,512	6,154	6,716	7,437

*\*We calculate this data based on Full time employees.*

*The total employees mentioned here includes contractual employees since the question asks for 'Total Employees', as specified in the "Denominator" question.*

### 3.3.4. Hiring

Tata AutoComp is committed to fair and inclusive hiring practices that strengthen our talent pipeline. We actively seek diverse perspectives and ensure equal opportunities across all levels of recruitment. In addition to hiring, we invest in talent through structured onboarding, continuous learning programs, and leadership development initiatives that empower employees to grow and thrive within the organization.

#### Hiring KPIs

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Total number of new employee hires	Number	1,495	1,464	1,668	1,421
Percentage of open positions filled by internal candidates	Percentage	5.44	15.77	15	22
Average hiring cost per FTE*	INR	2,98,324	3,11,619	12,191	3,321

*\*We have strengthened our internal hiring capabilities and also focused on digital hiring, significantly reducing our reliance on external recruiting agencies and reducing cost. This has led to a lower average cost per hire.*

We track workforce diversity by reporting hiring across different management levels and gender categories to ensure equitable representation. We also track and report on new and internal hires as per gender and management level.

#### New Hires Breakdown by gender (Number)

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Male	Number	1,182	1,131	1,298	1,057
Female	Number	313	333	370	364

#### New Hires Breakdown by management level (Number – management only)

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Junior Management	Number	222	285	369	335
Middle Management	Number	7	8	62	45
Senior Management	Number	2	3	10	11

#### Internal Hires Breakdown by gender (Number)

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Male	Number	56	10	12	94
Female	Number	6	4	3	16

#### Internal Hires Breakdown by management level (Number – management only)

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Junior Management	Number	26	8	8	78
Middle Management	Number	9	1	5	17
Senior Management	Number	2	5	2	15

### 3.3.5. Employee Turnover Rate

We monitor employee turnover (total and voluntary rate) for our FTE's to assess workforce stability and make informed retention strategies. Tracking turnover trends enables us to identify underlying causes, whether related to engagement, career progression, or work environment. This insight helps us proactively design targeted interventions, strengthen employee value propositions, and enhance long-term organizational resilience. During the year, our turnover reduced from 22% to 11%, because we led various talent and Learning & development interventions showcasing better talent retention at the Company.

#### Turnover rate (Percentage - Rate)

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Total Employee Turnover Rate	%	14	26	22	11
Voluntary Employee Turnover Rate	%	9	19	20	10
Data Coverage (as % of all FTE's globally)	%	100	100	100	100

We also disclose turnover trends for our FTE's segmented by management level and gender to identify demographic patterns and address gaps in engagement and retention.

#### Turnover Rate Breakdown by Gender (Percentage)

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Male	%	15	13	21	11
Female	%	9	8	24	12

#### Turnover Rate Breakdown by Management Level (Percentage)

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Junior Management	%	15	17	23	11
Middle Management	%	5	6	12	10
Senior Management	%	6	4	10	16

#### Voluntary Turnover Rate Breakdown by Gender (Percentage)

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Male	%	8	7	20	10
Female	%	6	6	22	12

#### Voluntary Turnover Rate Breakdown by Management Level (Percentage)

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Junior Management	%	8	9	22	11
Middle Management	%	3	3	12	10
Senior Management	%	3	1	8	11

#### 3.3.6. Long-term Incentives for Employees

Tata AutoComp does not provide any long-term incentives for employees.

#### 3.3.7. Employee Support Programs

Tata AutoComp has comprehensive employee support programs designed to foster the health and well-being of its workforce, governed by our formal Safety and Health, Maternity, and Leave policies.

##### *Employee benefits*

We provide the following benefits to support the holistic well-being of our employees:

- **Workplace Stress Management:** We offer mental wellness support programs that includes confidential access to professional counselling services through Wellness Vibes Program. A digital wellness app, FUROFIT, is also in place which provides tools for guided meditation and journaling.
- **Sport & Health Initiatives:** We promote physical health through the FUROFIT fitness app, which encourages activity via team challenges. Additionally, we provide comprehensive health check-ups for 100% of our employees. We also conduct various sports competitions such as cricket tournaments for our employees as part of our employee engagement practices.
- **WE Network:** Tata AutoComp's WE Network (Women Employees Network) conducts women centric Wellness program apart from development and engagement programs for all women employees and workers such as Cervical and Breast Cancer Awareness Workshops, Menstrual Hygiene workshops etc.

##### *Work Conditions*

Tata AutoComp supports a healthy work-life balance. Our benefits package includes flexible work options for employees, which cover both flexible working hours and work-from-home arrangements.

##### *Family Benefits*

We offer several family-friendly benefits to support our working parents:

- **Childcare and Nursing Facilities:** We provide a dedicated, on-site crèche facility at our plants, offering a professionally managed and nurturing environment for the children of employees. This facility also provides a supportive space for nursing mothers.
- **Paid Parental Leave:** We have a comprehensive Leave Policy and robust maternal and paternal leave policies which provide paid leave up to 26 weeks

and 1 weeks respectively , ensuring they have the time they need to support their families.

- Paid parental leave for the primary caregiver (Maternal leave): 26 weeks
- Paid parental leave for the non-primary caregiver (Paternal leave): 1 week
- **Paid Family or care leave:** Apart from standard parental leave, we also have the provision for child adoption leave to help and facilitate the women employees adopting children for making necessary adjustments in the changed circumstances and to make necessary arrangements.

*Read our Safety and Health Policy [here](#).*

*Read our Maternity Policy [here](#).*

*Read our Leave Rules Policy [here](#).*

### **3.3.8. Type of Performance Appraisal**

At Tata AutoComp, our performance and career development process is a cornerstone of our talent strategy, designed to align individual goals with the broader strategic objectives of the organization. We foster a high-performance culture through a transparent and multidimensional framework that ensures every employee has a clear understanding of their role, impact, and path for growth. Our appraisal cycle frequency is quarterly or up to twice a year depending on the employee grade and projects involved.

Our appraisal methodology is built on a foundation of continuous dialogue and structured evaluation. The process is formally structured around Management by Objectives (MBO), where individual Key Result Areas (KRAs) are aligned with our organizational Balance Score Cards (BSC) to incorporate team-based performance goals.

Beyond formal structures, we emphasize agile conversations as the norm, cultivating a culture of continuous feedback. This entire process is digitalized on SAP SuccessFactors, ensuring complete transparency and accessibility. Formal individual and team-based performance and career development reviews are conducted for 100% of our employees on a half-yearly basis.

In addition, we have a team-based performance appraisal system in place, where evaluation is done on a project-to-project basis. This is further supported by a multidimensional performance appraisal system, incorporating feedback and inputs from various stakeholders through a 360-degree feedback mechanism, enabling more informed and balanced decisions regarding employee appraisals.

### **3.3.9. Trend of Employee Wellbeing**

At Tata AutoComp, we believe that listening to our employees is fundamental to creating a positive and productive workplace. The cornerstone of our approach is the comprehensive

Employee Engagement Survey, which we conduct every two years. This confidential survey provides valuable insights into the employee experience, covering important areas such as leadership, career opportunities, and workplace culture. The questions asked include metrics on overall job satisfaction, happiness and inclusion of employees, purpose and meaning, stress and mental wellbeing, work environment, work-life balance and leadership among others. We analyze the feedback to develop targeted improvement plans, ensuring we are directly responding to the needs and suggestions of our people.

**Employee Satisfaction Survey Results (Percentage)**

Core Focus	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25	Target for FY 2024-25
Employee Engagement	% of employees with top level of engagement	80	80	80	90	85
Data Coverage	% of employees who responded to the survey	96	89	89	90	-

### 3.4. Occupational Health and Safety (OHS)

#### 3.4.1. OHS Policy

Tata AutoComp's [Safety and Health Policy](#) is applicable to all our facilities along the value chain of manufacturing units, JV partners at all locations where it operates and to all our corporate offices, employees, and business associated (contractor and suppliers). All our operational sites are certified to the ISO 45001:2018 international standard.

The Policy ensures compliance with relevant OHS international standards and regulations, such as ISO 45001:2018 across all business units. It is also supported with the Tata Safety & Health Management System (TSHMS) and various Standard Operating Procedures (SOPs) such as Health and Safety Manual, Hazard Identification and Risk Management Standard and Hazardous Materials Handling Standard among other SOPs. We also follow the Tata Health and Safety Standards which is applicable across all Tata companies.

We have set up robust targets across all our business units and maintain quarterly business unit wise scorecards to assess and continually improve safety performance. Moreover, consultation with and participation of workers, and where they exist, workers' representatives, is embedded across operations to strengthen accountability and ownership of safety practices. We commit to improving the performance of the OHS management system through periodic reviews, risk assessments, and corrective actions.

The endorsement of the implementation of the [Safety and Health Policy](#) rests with the Board of Directors.

Read our [Safety and Health Policy here](#).

#### 3.4.2. OHS Programs

Our Occupational Health and Safety (OHS) program is supported by a well-structured management system aimed at creating a safe and healthy work environment. As part of this

initiative, we conduct risk and hazard assessments to identify potential sources of harm within the workplace along with focused safety walks and surprise safety rounds across all Business Units (BU) by all the BU safety Heads.

We regularly identify and assess any potential safety risks associated across our business units. To effectively address those and we implement targeted action plans with clear, and measurable objectives. Our dedication to safety is reinforced by detailed internal inspections and protocols designed to investigate any work-related injuries, illnesses, diseases, and incidents. We also engage in regular internal and independent external audits by BUs and third-party agencies respectively, of our health, safety, and well-being practices, adhering to global standards such as ISO 45001:2018, and Tata Safety & Health Management System (TSHMS).

We have a digitized safety platform, which facilitates the efficient reporting and management of safety incidents and potential risks. This system is supported by the Hazard Identification and Risk Assessment (HIRA) procedures, which are applied to identify work-related hazards and assess risks in both routine and non-routine scenarios.

We offer comprehensive training and refresher courses that not only increase awareness but also prepare our employees to respond effectively to potential hazards. As part of our digital transformation efforts, we have implemented Safety Training Kiosks at all our plants and facilities. These kiosks deliver tailored business unit-specific training to new employees, contractors and visitors. Furthermore, OHS criteria are integrated into procurement and contractual requirements, ensuring our safety culture extends across suppliers and partners in the value chain.

Our systems are also subject to independent external verification of health, safety, and well-being. Specifically, our operations are certified to ISO 45001:2018 and OHSAS 18000 ensuring adherence to global best practices.

Read our Safety and Health Policy [here](#).

### 3.4.3. Fatalities

Safety is our top priority, and we transparently report workplace fatalities as part of our commitment to zero harm. Over the past 4 financial years, we have reported zero fatalities across our employees and contractors demonstrating our commitment to the highest safety standards.

#### Fatalities

Fatalities	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Employees	Number	0	0	0	0
Contractors (Contractual employees)	Number	0	0	0	0

This data point is third-party verified.

Refer to our Assurance statement certificates in the Annexures of this Factbook..

#### 3.4.4. Lost-Time Injury Frequency Rate (LTIFR) – Employees

We measure LTIFR of our employees to monitor the effectiveness of our safety management systems and drive continuous improvement. Monitoring this metric helps us identify trends, assess risk levels, and implement targeted interventions to reduce workplace incidents. In the past 2 financial years, we have not reported any lost time injury for our employees across our business units.

##### LTIFR for Employees (Rate)

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Employees LTIFR	LTIFR	0.16	0.13	0	0
Data coverage	Percentage of employees	100%	100%	100%	100%

This data point is third-party verified.

Refer to our Assurance statement certificates in the Annexures of this Factbook.

#### 3.4.5. Lost-Time Injury Frequency Rate (LTIFR) – Contractors

LTIFR for contractors is tracked with equal rigor, ensuring that contractors working at our sites operate under the same stringent safety standards as our employees. In the past 4 financial years, we have not reported any lost time injury for our contractors across our business units.

##### LTIFR for Contractors (Rate)

Particulars	UoM	FY 2021-22	FY 2022-23	FY 2023-24	FY 2024-25
Contractors LTIFR (Contractual employees)	LTIFR	0	0	0	0
Data coverage	Percentage of contractors	100%	100%	100%	100%

This data point is third-party verified.

Refer to our Assurance statement certificates in the Annexures of this Factbook

# Annexures

## ISO Certifications

### Composites Division (CD)

**Bureau Veritas Certification**

**TATA AUTOCOMP SYSTEMS LIMITED  
COMPOSITES DIVISION**

**TATA AUTOCOMP SYSTEMS LIMITED**  
Composites Division

HEAD OFFICE: D-236, MDC, CHAKAN PHASE-2, NEAR CORNING COMPANY, A/P-VARALE, TAL-KHED, PUNE - 410 501, MAHARASHTRA, INDIA.

This is a multi-site certificate, additional site(s) are listed on the next page(s).

Bureau Veritas Certification Holding SAS - UK Branch certifies that the Management System of the above Organisation has been audited and found to be in accordance with the requirements of the Management System Standards detailed below.

**Standards**

**ISO 14001:2015 & ISO 45001:2018**

Scope of certification

**MANUFACTURE OF COMPOSITES MATERIAL, COMPOSITES PRODUCTS, FRAME WELDING AND ASSEMBLIES FOR AUTOMOTIVE AND INDUSTRIAL APPLICATIONS, MANUFACTURE OF PAINTED COMPOSITES PRODUCTS AND ASSEMBLIES, MANUFACTURE OF MOULDED AND PAINTED PLASTIC COMPONENTS & ASSEMBLIES FOR INTERIOR, EXTERIOR APPLICATIONS.**

Original cycle start date for ISO 14001: **30 June 2014**  
Original cycle start date for ISO 45001: **20 August 2020**  
Recertification cycle start date: **30 March 2024**

Subject to the continued satisfactory operation of the Organisation's Management System, this certificate is valid until: **03 April 2027**

Certificate No: **IND.24.2613IMU** Version: 1 Issue date: **30 March 2024**

Signed on behalf of BVCH SAS UK Branch  
**Jagdish H. BARKAI**  
Director - CERTIFICATION, South Asia  
Commodities, Industry & Facilities Division

Certification body address: 5th Floor, 65 Piccadilly Street, London, E1 8DS, United Kingdom

Local office: Bureau Veritas (India) Private Limited (Certification Business)  
72 Business Park, 14th Industrial Area, MIDC Cross Road 'C', Chakan (East), Pune - 410 501, India

Further clarifications regarding the scope of this certificate and the applicability of the management system requirements may be obtained by consulting the registration.  
The above text certificate is valid until 03 April 2026.

**Bureau Veritas Certification**

**TATA AUTOCOMP SYSTEMS LIMITED  
COMPOSITES DIVISION**

**Standards**

**ISO 14001:2015 & ISO 45001:2018**

SITE	ADDRESS	SCOPE
HO - CHAKAN	PLOT NO D-236, MDC, CHAKAN PHASE-2, VILLAGE: VARALE, TAL-KHED, DIST. PUNE - 410501, MAHARASHTRA, INDIA.	MANUFACTURE OF COMPOSITES MATERIAL & COMPOSITES PRODUCTS AND ASSEMBLIES FOR AUTOMOTIVE AND INDUSTRIAL APPLICATIONS
SITE 1 - PANTNAGAR	PLOT NO-M, SECTOR-11, BE SIDCOL, PANTNAGAR US NAGAR - 263 153, UTTARAKHAND, INDIA.	MANUFACTURE OF PAINTED COMPOSITES PRODUCTS AND ASSEMBLIES, MANUFACTURE OF MOULDED AND PAINTED PLASTIC COMPONENTS & ASSEMBLIES FOR INTERIOR, EXTERIOR APPLICATIONS
SITE 2 - JAMSHEDPUR	PLOT NO 5532, BAY 6 & 10, OUTER COMPLEX, INSIDE TATA MOTORS LTD, JAMSHEDPUR - 831 004, JHARHAND, INDIA.	1) MANUFACTURE OF PAINTED COMPOSITES PRODUCTS AND ASSEMBLIES FOR AUTOMOTIVE APPLICATIONS 2) MANUFACTURE OF MOULDED AND PAINTED PLASTIC COMPONENTS & ASSEMBLIES FOR INTERIOR, EXTERIOR APPLICATIONS
SITE 3 - PITHAMPUR	PLOT-4B, INDUSTRIAL GROWTH CENTRE, SECTOR-6, MPAKVN, PITHAMPUR, DIST. DHAR - 454 775, MADHYA PRADESH, INDIA.	MANUFACTURE OF COMPOSITES PRODUCTS FOR AUTOMOTIVE APPLICATIONS

Certificate No. **IND.21.1921MIU** Version: 1 Revision date: **03 April 2021**

Signed on behalf of BVCH SAS - UK Branch  
**Jagdish H. BARKAI**  
Head - CERTIFICATION, South Asia  
Commodities, Industry & Facilities Division

Certification body address: 5th Floor, 65 Piccadilly Street, London, E1 8DS, United Kingdom

Local office: Bureau Veritas (India) Private Limited (Certification Business)  
72 Business Park, 14th Industrial Area, MIDC Cross Road 'C', Chakan (East), Mumbai - 400 001, India

Further clarifications regarding the scope of this certificate and the applicability of the management system requirements may be obtained by consulting the registration.  
To check this certificate validity please call +91 22 4274 2000.

**Bureau Veritas Certification**

**Certificate of Approval**

This is to certify that the Quality Management System of:

**TATA AUTOCOMP SYSTEMS LIMITED, COMPOSITES DIVISION**  
PLOT NO- D236, CHAKAN MIDC PHASE II VILLAGE - VARALE, TAL- KHED, PUNE, STATE MAHARASHTRA, PIN 410 501, India

has been audited in accordance with the requirements of EN 9104:001:2013 by Bureau Veritas Certification and conforms to the following Quality Management Systems Standards detailed below

**Standards**

**BS EN ISO 9001:2015**  
**EN 9100 : 2018**  
(Technically equivalent to AS9100D)

Scope of certification

**FORMULATION OF COMPOSITE MATERIALS AND MANUFACTURE AND SUPPLY OF COMPOSITE PRODUCTS AND ASSEMBLIES.**

Certification Structure: Single Site

This certificate forms part of the approval identified by certificate number: **IN049732**

Original ASCS Approval: **18 March 2025**  
Certificate Issue Date: **18 March 2025**  
Certificate Expiry Date: **17 March 2028**

Signed on behalf of Bureau Veritas Certification  
**Trevor William Douce**  
Authorised Signatory

Further clarifications regarding the scope of this certificate and the applicability of the management system requirements may be obtained by consulting the registration.

Certification Body: 5th Floor, 100 Lower Thames Street, London, EC3R 6DL, United Kingdom

**Bureau Veritas Certification**

**Certificate of Approval**

AWARDED TO

**TATA AUTOCOMP SYSTEMS LTD - COMPOSITES DIVISION**  
D-236, MDC, Chakan Phase-2, Near Corning Company, A/P-Varale, Tal-Khed, Pune - 410501, Maharashtra, India  
IATF USI: 66G2C9

Bureau Veritas Certification certify that the Quality Management System of the above organisation has been audited and found to be in accordance with the requirements of

**IATF 16949 - FIRST EDITION**  
and the applicable customer specific requirements

**SCOPE**

Design and manufacturing  
**PERMITTED EXCLUSION(S)**

None

**PRODUCT(S) DELIVERED**

Sheet Molding compound, Bulk Molding Compound Materials,  
Composite Products & Assemblies

Date Of Certification: **19 December 2024**  
Date Of Expiration: **18 December 2027**  
IATF Certificate N°: **0559630**  
Bureau Veritas Certification Certificate No: **IN049437/1 - IATF** Revision: **1**

For Bureau Veritas Certification Holding, Tour ALTO, 4 place des saïsons, 92400 COURBEVOIE - France  
(The official document is in English. Any translations of this document shall be used for reference only.)

# Interiors and Plastics Division (IPD)

Bureau Veritas Certification



**TATA AUTOCOMP SYSTEMS LTD.**  
Interiors & Plastics Division

HEAD OFFICE: SURVEY NO. 235 & 245, VILLAGE- HINJAWADI, TAL- MULSHI, DIST. PUNE - 411 057, MAHARASHTRA, INDIA.

This is a multi-site certificate, additional site(s) are listed on the next page(s)

*Bureau Veritas Certification Holding SAS - UK Branch certifies that the Management System of the above Organisation has been audited and found to be in accordance with the requirements of the Management System Standards detailed below.*

**Standards**

**ISO 14001:2015 & ISO 45001:2018**

*Scope of certification*

**MANUFACTURE, ASSEMBLY AND DISPATCH OF MOULDED, PAINTED PLASTIC COMPONENTS & ASSEMBLIES FOR INTERIOR, EXTERIOR AND UNDERHOOD APPLICATION IN AUTOMOTIVE AND NON-AUTOMOTIVE INDUSTRY.**

Original cycle start date for ISO 14001: 22 March 2014  
Original cycle start date for ISO 45001: 12 March 2020  
Recertification cycle start date: 09 March 2023  
Subject to the continued satisfactory operation of the Organisation's Management System, this certificate is valid until: 11 March 2026  
Certificate No. IND.23.4058/IMU Version: 1 Issue date: 09 March 2023

*For certificate authenticity, click here <https://certcheck.ukas.com/>*

ISO 14001	IN643109
ISO 45001	IN643110

Signed on behalf of BVCH SAS UK Branch  
**Jagdish H. RAMANI**  
Director - CERTIFICATION, South Asia  
Commodities, Industry & Facilities Division

Certification body address: 5th Floor, 85 Prescott Street, London, E1 8HG, United Kingdom

Local office: Bureau Veritas (India) Private Limited (Certification Business), 72 Business Park, Midc Industrial Area, MIDC Cross Road "C", Andheri (East), Mumbai - 400 001, India

Further clarifications regarding the scope of this certificate and the applicability of the management system requirements may be obtained by contacting the organisation. To check this certificate validity please call +31 22 6274 2000.

Bureau Veritas Certification



**TATA AUTOCOMP SYSTEMS LTD.**  
Interiors & Plastics Division

**ISO 14001:2015 & ISO 45001:2018**

*Scope of certification*

SITE	ADDRESS	SCOPE
HEAD OFFICE	SURVEY NO 235 & 245, VILLAGE- HINJAWADI, TAL- MULSHI, PUNE - 411 057, MAHARASHTRA, INDIA.	MANUFACTURE & DISPATCH OF MOULDED & PAINTED PLASTIC COMPONENTS & ASSEMBLIES FOR INTERIOR, EXTERIOR APPLICATION IN AUTOMOTIVE INDUSTRIES
SITE 1	PLOT NO 23A, BIDDI INDUSTRIAL AREA, RAMANAGARA TALUKA & DIS. BANGALORE - 562 106, INDIA.	MANUFACTURE & DISPATCH OF MOULDED PLASTIC COMPONENTS & ASSEMBLIES FOR INTERIOR, EXTERIOR APPLICATION IN AUTOMOTIVE INDUSTRIES
SITE 2	PLOT NO A-2, SURVEY NO. 1, TML VENDER PARK, VILLAGE NORTH KOTPURA, TALUKA SANAND, PO. VIROCH NAGAR, AHMEDABAD - 382 170, GUJARAT, INDIA.	MANUFACTURE & DISPATCH OF MOULDED & PAINTED PLASTIC COMPONENTS & ASSEMBLIES FOR INTERIOR, EXTERIOR APPLICATION IN AUTOMOTIVE INDUSTRIES
SITE 3	PLOT NO. 311 D-2 BLOCK, MIDC CHINCHWAD, PUNE - 411 019, MAHARASHTRA, INDIA.	MANUFACTURE & DISPATCH OF MOULDED PLASTIC COMPONENTS & ASSEMBLIES FOR INTERIOR, EXTERIOR APPLICATION IN AUTOMOTIVE INDUSTRIES
SITE 4	GATNO-1494, RANUNGAON MIDC, NEAR JABIL COMPANY, PUNE - 422 206, MAHARASHTRA, INDIA.	ASSEMBLY & DISPATCH OF PLASTIC COMPONENTS FOR AUTOMOBILE INDUSTRIES
SITE 5	PLOT NO. 0236, CHAMAN INDUSTRIAL AREA, VIRALE, CHAKAN, PUNE - 410 501, MAHARASHTRA, INDIA.	MANUFACTURE & DISPATCH OF MOULDED PLASTIC COMPONENTS & ASSEMBLIES FOR INTERIOR, EXTERIOR APPLICATION IN AUTOMOTIVE INDUSTRIES

Certificate No. IND.23.4058/IMU Version: 1 Issue date: 09 March 2023

*For certificate authenticity, click here <https://certcheck.ukas.com/>*

ISO 14001	IN643109
ISO 45001	IN643110

Signed on behalf of BVCH SAS UK Branch  
**Jagdish H. RAMANI**  
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Commodities, Industry & Facilities Division

Certification body address: 5th Floor, 85 Prescott Street, London, E1 8HG, United Kingdom

Local office: Bureau Veritas (India) Private Limited (Certification Business), 72 Business Park, Midc Industrial Area, MIDC Cross Road "C", Andheri (East), Mumbai - 400 001, India

Further clarifications regarding the scope of this certificate and the applicability of the management system requirements may be obtained by contacting the organisation. To check this certificate validity please call +31 22 6274 2000.

# EV Division

Bureau Veritas Certification

**Certificate of Approval**

Awarded to

**TATA AUTOCOMP SYSTEMS LTD - EV DIV**

ESR INDUSTRIAL LOGISTICS PARK PRIVATE LIMITED,  
PLOT NO. A-78, VILLAGE VASULI, TAL. KHED,  
PUNE - 410501, MAHARASHTRA, INDIA

Bureau Veritas Certification certifies that the Quality Management System of the above organisation has been audited and found to be in accordance with the requirements of

**IATF 16949 - First Edition**

and the applicable customer specific requirements



**SCOPE**

Design and manufacturing

**PERMITTED EXCLUSION(S)**

None

**PRODUCT(S) DELIVERED**

1. LITHIUM - ION PACK  
2. MANUFACTURING OF BUS BAR

Date Of Certification: 16 February 2023  
Date Of Expiration: 15 February 2026  
IATF Certificate N°: 0468684  
Bureau Veritas Certification Certificate N°: IN043034- IATF Revision: 1

For Bureau Veritas Certification Holding, Le Triangle de l'Arche, 8 Cours du Triangle - 92809 Puteaux - France  
(The official document is in English. Any translations of this document shall be used for reference only.)

Bureau Veritas Certification



**Appendix to the Certificate of Approval**

Awarded to

**TATA AUTOCOMP SYSTEMS LTD - EV DIV**

ESR INDUSTRIAL LOGISTICS PARK PRIVATE LIMITED,  
PLOT NO. A-78, VILLAGE VASULI, TAL. KHED,  
PUNE - 410501, MAHARASHTRA, INDIA

**REMOTE SUPPORT FUNCTION(S)**

Name	Address	Scope
TATA AUTOCOMP SYSTEMS LTD - EV DIV	PLOT NO. A78, BLOCK-F2, HORIZON INDUSTRIAL PARK, CHAMAN INDUSTRIAL AREA PHASE-II, CHAKAN, TAL. KHED, PUNE - 410501, MAHARASHTRA, INDIA	MARKETING, POLICY MAKING, STRATEGIC PLANNING, CONTRACT REVIEW, QUALITY SYSTEM MANAGEMENT, WARRANTY MANAGEMENT, TRAINING, INFORMATION TECHNOLOGIES, PRODUCT DESIGN, ENGINEERING, HUMAN RESOURCE

Date Of Certification: 16 February 2023  
Date Of Expiration: 15 February 2026  
IATF Certificate N°: 0468684  
Bureau Veritas Certification Certificate N°: IN043034- IATF Revision: 1

For Bureau Veritas Certification Holding, Le Triangle de l'Arche, 8 Cours du Triangle - 92809 Puteaux - France  
(The official document is in English. Any translations of this document shall be used for reference only.)



# SAFEONE ENGINEERING SERVICES

Flat No. D-17, Sukhwani Akashdeep, Shastrinagar, Kasarwadi, Pune 411034.  
maheshmandake@gmail.com / safeone2018@gmail.com  
8888881514 / 8888089098  
GST No.: 27AKCPM3214A1ZU SAC Code: 998333

## Independent Assurance Statement

**To:** Tata AutoComp Systems Limited

### **Introduction and Objective of Work**

**Safeone Engineering Services** has been engaged by **Tata AutoComp Systems Limited** (Standalone legal entity) to provide independent verification of the Lost Time Injury Frequency Rate (LTIFR) and Number of Fatalities for employees<sup>1</sup> and contractors<sup>2</sup> for the reporting years FY 2021-22, FY 2022-23, FY 2023-24 and FY 2024-25.

### **Assurance Standard Used**

We performed a limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 Revised: Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board.

### **Scope of Work**

The scope of assurance involves safety performance (LTIFR and Fatalities) across Tata AutoComp Systems Limited's Legal Entity Divisions (TLE):

- Interior & Plastic Division (IPD)
- Composites Division (CD)
- Tata AutoComp Gotion Green Energy Solutions (Gotion)
- Tata AutoComp Systems - Supply Chain Solutions (TSS)
- TATA AutoComp Systems Ltd- Technical Centre (TTC)
- Independent Aftermarket (IAM)
- Group Office

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<sup>1</sup> Employees refer to Tata Autocomp Systems Limited's permanent employees

<sup>2</sup> Contractors refer to Tata Autocomp Systems Limited's contractual employees



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**GST No.: 27AKCPM3214A1ZU**      **SAC Code: 998333**

The scope of our work was limited to assurance of the following information:

- The reported Lost Time Injury Frequency Rate (LTIFR) and fatalities for FY 2021-22, FY 2022-23, FY 2023-24 and FY 2024-25;
- The methodology used to calculate LTIFR with reference to IS 3786:2022 – Method for Computation of Frequency and Severity Rates for Industrial Injuries and Classification of Industrial Accidents; and
- The completeness and relevance of the Incident/Accident Register maintained by Tata AutoComp Systems Limited for the reporting period.

This assurance does not extend to other health and safety indicators or information outside the scope described above.

## Responsibilities

### Management's Responsibility:

The management of **Tata AutoComp Systems Limited** is responsible for the preparation and presentation of the Lost Time Injury Frequency Rate (LTIFR) and Number of Fatalities data for their employees and contractors for the reporting years FY 2021-22, FY 2022-23, FY 2023-24 and FY 2024-25.

### Assurer's Responsibility:

**Safeone Engineering Services** is responsible for conducting independent assurance procedures on the reported LTIFR and fatalities, and expressing a conclusion based on the evidence obtained.

## Reporting Criteria

The Lost Time Injury Frequency Rate (LTIFR) has been assessed in accordance with IS 3786:2022 – Methods for computation of frequency and severity rates for industrial injuries and classification of industrial accidents, using the following formula:



# SAFEONE ENGINEERING SERVICES

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$$LTIFR = \frac{\text{Number of Lost Time Injuries} \times 1,000,000}{\text{Total hours worked in accounting period}}$$

LTIFR is calculated and reported separately for

- Employees
- Contractors

Fatalities are reported as the absolute number of work-related deaths that occurred during the reporting period, categorized separately as:

- Fatalities among Employees
- Fatalities among Contractors

## Methodology

Our assurance procedures included, but were not limited to:

- Reviewing Tata AutoComp Systems Limited's LTIFR and fatalities calculation methodology and formula for both employees and contractors
- Examining the Incident/Accident Register for FY 2021-22, FY 2022-23, FY 2023-24 and FY 2024-25;
- Conducting physical & virtual site visits at respective plant locations.
- Cross-verifying register entries with supporting documentation (medical/first-aid records, absence and payroll data, statutory submissions, EHS committee minutes);
- Confirming total hours worked in accounting period worked with HR and operational records;
- Validating incident classification to ensure that only Lost Time Injuries were included; and



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**SAC Code: 998333**

- Obtaining management representation on the completeness of the reported information.

## Limitations

Excluded from the scope of our work is any assurance of information relating to:

- Activities outside the defined scope and period;
- Any statements or claims made in relation to the reported LTIFR;
- The appropriateness of the Reporting Criteria.

This limited assurance engagement relies on a risk-based selected sample of data and the associated limitations that this entails. Accordingly, this statement should not be relied upon to detect all errors, omissions, or misstatements that may exist.

## Findings

- The LTIFR methodology applied by Tata AutoComp Systems Limited is consistent with IS 3786:2022;
- The Incident/Accident and Fatality Register was found to be complete, relevant, and consistent with supporting evidence reviewed;
- The following observations were made:

FY	Lost Time Injuries		Fatalities		LTIFR	
	Employees	Contractors	Employees	Contractors	Employees	Contractors
FY 2021-22	1	0	0	0	0.16	0
FY 2022-23	1	0	0	0	0.13	0
FY 2023-24	0	0	0	0	0	0
FY 2024-25	0	0	0	0	0	0



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**GST No.: 27AKCPM3214A1ZU**

**SAC Code: 998333**

## Conclusion

Based on our verification procedures and the evidence reviewed, we confirm that the LTIFR values and Fatalities values for employees and contractors reported by Tata AutoComp Systems Limited (Standalone entity) for FY 2021-22, FY 2022-23, FY 2023-24 and FY 2024-25 has been accurately and properly prepared, in all material respects, in line with the stated methodology and supporting documentation.

## Independence, Integrity, and Competence

Safeone Engineering Services is an independent professional services provider, operating under well-established systems that prioritize safety assurance, ethical standards, and professional conduct. Safeone Engineering Services has no conflict of interest related to providing assurance of the safety data. We confirm that this engagement has been carried out with integrity, objectivity, professional competence, and due care.

## For Safeone Engineering Services



**Mahesh B. Mandake**

Competent Person F.A.1948

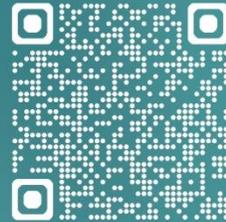
MS/DISH/CPC/M-061/2023

Place- Pune, India

Date- 04/10/2025.

# Contact Us

Visit our Website



Tata AutoComp Systems Ltd.,  
TACO House, Off Law College Road,  
Damle Path, Pune, 411004, India

Phone: 020 66085000



E-mail: [contact@tataautocomp.com](mailto:contact@tataautocomp.com)



Website: [www.tataautocomp.com](http://www.tataautocomp.com)

