

# Tata Consumer Products Limited

(Formerly Tata Global Beverages Limited)

## Hiring Guidance

### **Why Do We Have This Guidance?**

All Tata Consumer Products Limited employees are hired on the basis of their qualifications, merit, and demonstrated ability to perform the job for which they are hired. This Guidance is provided to assist those Tata Consumer Products Limited employees involved in hiring decisions with respect to candidates referred to Tata Consumer Products Limited by Foreign Government Officials. This Guidance should be read in conjunction with Tata Consumer Products Limited Anti-Bribery and Anti-Corruption (“ABC”) Policy.

### **Scope of Guidance**

The requirements in this Guidance are applicable to Tata Consumer Products Limited, all its subsidiaries and controlled affiliates, and all Tata Consumer Products Limited directors, officers, and employees (including temporary staff and consultants) and employees serving as directors (or equivalent) of non-controlled affiliates (“Employees”).

This Guidance should be consulted in connection with the retention or possible retention of a candidate referred to Tata Consumer Products Limited by government officials, as defined in Tata Consumer Products Limited ABC Policy, in countries other than the United States (“Foreign Government Official.”).

If local law or a business unit imposes stricter requirements than those described in this Guidance, Employees must comply with those rules.

### **Prohibition on Preferential Hiring of Relatives or Close Relations Of Foreign Government Officials and Referrals from Foreign Government Officials**

As explained in greater detail in Tata Consumer Products Limited ABC Policy, the US Foreign Corrupt Practices Act (“FCPA”) prohibits the entities it covers from corruptly offering “anything of value” to a Foreign Government Official for the purposes of obtaining or retaining business. “Anything of value” includes the preferential treatment in the hiring process for relatives or close relations of Foreign Government Officials, or referrals from Foreign Government Officials in exchange for business opportunities.

### **Requirements**

To minimize the risk of violating the FCPA, creating a conflict of interest, or of creating even an appearance of impropriety, any candidate that is referred to Tata Consumer Products Limited by a Foreign Government Official for a position at TGBL, including candidates for temporary positions or internships, must not receive any preferential treatment in the hiring process. It is important to note that a job provided to the relative of a Foreign Government Official could, under certain circumstances, constitute a “thing of value” provided to such official for purposes of the FCPA. Thus, offering employment to the relative of a Foreign Government Official requires preapproval given the potential corruption risk.

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In the event that a candidate is referred to Tata Consumer Products Limited by a Foreign Government Official, the Tata Consumer Products Limited Employee receiving the referral must disclose to Human Resources that the referral was made by a Foreign Government Official and forward the candidate's application to Human Resources within 48 hours after it is received for additional due diligence.

The Human Resources Employee with oversight for filling the position must first speak to those Employees that interact with the referring Foreign Government Official (for example, business unit leaders), and determine if the referring Foreign Government Official has any oversight or approval authority for any pending or near-pending matters with to Tata Consumer Products Limited by the Foreign Government Official should not be within the scope of that Foreign Government Official's regulatory or decision-making authority. If so, Human Resources must contact the Ethics Officer to determine if the hiring process may proceed.

Once the authority of the referring Foreign Government Official has been assessed and cleared, the Human Resources Employee with oversight for filling the position must take each of the following steps before the candidate may be offered employment with Tata Consumer Products Limited :

- Review the educational and professional qualifications of the candidate to ensure that he or she is appropriate for the position being filled;
- Require that the candidate complete For example, a candidate referred to Tata Consumer Products Limited standard application and interview process;
- Ensure that the candidate does not receive any preferential treatment in the hiring process as compared to an applicant that was not referred to For example, a candidate referred to Tata Consumer Products Limited by a Foreign Government Official;
- Obtain pre-clearance from an Ethics Officer before proceeding with the hiring process; and
- Assess the nature of the candidate's relationship to the referring or any other Foreign Government Official.

Tata Consumer Products Limited may only hire the candidate if he or she has the necessary qualifications for the position; if the application and interview process confirm that the candidate satisfies the requirements for the position; and if the candidate would have been engaged by Tata Consumer Products Limited regardless of his/her relationship or affiliation with the Foreign Government Official.

If a candidate that is a referral from a Foreign Government Official is retained, each of the following must be ensured:

- The salary, compensation and treatment given to the candidate must be commensurate with the position and consistent with other individuals in a similar position;
- To the extent possible, the responsibilities of the candidate referred

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to Tata Consumer Products Limited by the Foreign Government Official should not be within the scope of that Foreign Government Official's regulatory or decision-making authority.

For example, a candidate referred to Tata Consumer Products Limited by a Foreign Government Official charged with overseeing a contract with Tata Consumer Products Limited should not be hired as the contract manager for that contract.

Similarly, the hiring decision-maker should be independent of the business unit that may interact with the Foreign Government Official referring the candidate.

- Where a candidate is related to the referring Foreign Government Official, approval of the Ethics Officer or his or her designee is required before the hire may proceed.

## **Violations**

Any violation, breach, or failure to abide by anti-corruption laws, the TCoC, this Guidance, or related Tata Consumer Products Limited Policies and Procedures is a serious matter and can result in criminal or civil penalties against Consumer Products Limited and the individual involved in the violation, as well as cause harm to Tata Consumer Products Limited reputation. Compliance with the Hiring Guidance is mandatory, and Consumer Products Limited will take appropriate corrective action as may be deemed appropriate. Violations may also result in loss of incentive compensation, stock options, bonuses, or other awards, to the extent permitted by law. Such action shall be in addition to any other rights or remedies that Tata Consumer Products Limited may have against the defaulting employee under any applicable law.