

TATA GLOBAL BEVERAGES

Tata Consumer Products Limited (Formerly known as Tata Global Beverages Limited)

Hiring Guidance

Why Do We Have This Guidance?

All Tata Consumer Products Limited (Formerly known as Tata Global Beverages 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 (Formerly known as Tata Global Beverages Limited) employees involved in hiring decisions with respect to candidates referred to Tata Consumer Products Limited (Formerly known as Tata Global Beverages Limited) by Foreign Government Officials. This Guidance should be read in conjunction with Tata Consumer Products Limited (Formerly known as Tata Global Beverages Limited) Anti-Bribery and Anti-Corruption (“ABC”) Policy.

Scope of Guidance

The requirements in this Guidance are applicable to Tata Consumer Products Limited (Formerly known as Tata Global Beverages Limited), all its subsidiaries and controlled affiliates, and all Tata Consumer Products Limited (Formerly known as Tata Global Beverages 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 (Formerly known as Tata Global Beverages Limited) by government officials, as defined in Tata Consumer Products Limited (Formerly known as Tata Global Beverages 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 TGBL’s 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 TGBL 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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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 (Formerly known as Tata Global Beverages 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 (Formerly known as Tata Global Beverages 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 (Formerly known as Tata Global Beverages Limited) Limited may have against the defaulting employee under any applicable law.