HQ/CS/CL.24B/17236
December 03, 2021

National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Mumbai – 400 051
SYMBOL: TATACOMM

BSE Limited
P.J. Towers, Dalal Street,
Mumbai – 400 001
Scrip Code: 500483

Dear Sir/Madam,

Sub: Reporting Violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

This is to inform you that in terms of the SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of violation of the Company's code of conduct under the SEBI (Prohibition of Insider Trading) Regulations, 2015 by the Designated Person along with the action taken by the Company thereon is enclosed to this letter.

We would like to submit that the reported deviation is not material in relation to the total paid-up equity share capital of the Company.

Kindly take the same on your records.

Yours faithfully,
For Tata Communications Limited

Zubin Adil Patel
Digitally signed by Zubin Adil Patel
Date: 2021.12.03 19:14:23 +05'30'

Zubin Adil Patel
Company Secretary and Compliance Officer

Report by Tata Communications Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

[Schedule B read with Regulation 9 (1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, (“PIT Regulations”)]

<table>
<tr><th>N</th><th>Particulars</th><th>Details</th></tr>
<tr><td>1.</td><td>Name of the Listed Company~~/ Intermediary/ Fiduciary~~</td><td>Tata Communications Limited (the ‘Company’)</td></tr>
<tr><td>2.</td><td>Please tick appropriate checkbox
Reporting in Capacity of:
☐ Listed Company
~~☐ Intermediary~~
~~☐ Fiduciary~~</td><td>Listed Company</td></tr>
<tr><td rowspan="13">3.</td><td>A. Details of Designated Person (DP)</td><td></td></tr>
<tr><td>i. Name of DP</td><td>Mr. Krishnakumar Natarajan (‘DP’)</td></tr>
<tr><td>ii. PAN of DP</td><td>AAAPK6972D</td></tr>
<tr><td>iii. Designation of DP</td><td>Independent Director</td></tr>
<tr><td>iv. Functional Role of DP</td><td>The DP is an Independent Director of the Company</td></tr>
<tr><td>v. Whether DP is Promoter or belongs to Promoter Group</td><td>No</td></tr>
<tr><td>B. If Reporting is for immediate relative of DP</td><td></td></tr>
<tr><td>i. Name of the immediate relative of DP</td><td rowspan="2">NA</td></tr>
<tr><td>ii. PAN of the immediate relative of DP</td></tr>
<tr><td>C. Details of transaction(s)</td><td></td></tr>
<tr><td>i. Name of the scrip:</td><td>BSE: 500483
NSE: TATACOMM</td></tr>
<tr><td>ii. No of Shares traded and value (Rs.) (Date-wise):</td><td>
<table>
<tr><th>Type of Transaction</th><th>No. and type of securities</th><th>Date of transaction</th><th>Value of transaction (₹)</th></tr>
<tr><td>Purchase</td><td>246 equity shares</td><td>08 September 2021</td><td>340,136.00</td></tr>
<tr><td>Purchase</td><td>95 equity shares</td><td>04 October 2021</td><td>136,085.52</td></tr>
<tr><td>Purchase</td><td>101 equity shares</td><td>2 November 2021</td><td>129,574.29</td></tr>
<tr><td colspan="3">Total</td><td>6,05,795.81</td></tr>
</table>
</td></tr>
</table>

Report by Tata Communications Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

[Schedule B read with Regulation 9 (1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, ("PIT Regulations")]

N	Particulars	Details
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	a) Date of intimation of trade(s) by concerned DP/ director /promoter /Promoter group to company under regulation 7 of SEBI (PIT) Regulations, 2015	NA
	b) Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT), Regulations, 2015	NA
4	Details of violations observed under Code of Conduct	The portfolio management firm ('PM firm') managing the securities portfolio of the DP on a discretionary basis carried out three trades in the Company's securities without knowledge of or instructions from DP. The trade carried out on 4 October 2021 was during trading window closure period while the trades on 08 September 2021 and 2 November 2021 were done when the trading window was open. The DP had given clear written instructions to PM firm to not trade in the Company's securities, yet the trades in question were carried out due to oversight of the PM firm. The said non-compliance was brought to the notice of the Compliance Officer by the DP.
5.	Action taken by Listed Company/ ~~Intermediary/ Fiduciary~~	The above non-compliance on the part of the DP was reported to the Audit Committee on 1 December 2021 after the completion of an investigation by Management. Based on review of the submissions and documentary evidence provided by the DP, Audit Committee (AC) was informed that the DP had taken requisite measures to ensure compliance with the PIT Code of Conduct of the Company, including through issuing specific written instructions to his PM firm to not deal in the Company's securities, and the trades were carried out without his knowledge and in contradiction to his specific written instructions; and that the trades were an inadvertent violation of the Company's PIT Code without any act/ omission on the part of the DP or any intent on the part of DP to violate the Company's PIT Code or the SEBI PIT Regulations. However, AC determined that though inadvertent, there was a violation of the Company's PIT Code and the SEBI PIT Regulations and has therefore imposed a penalty of ₹60,580/- (being 10% of the total value of transactions) to be paid by DP to Investor Protection and Education Fund, SEBI and advised the DP to again instruct the PM firms to not trade in the Company's securities without specific instructions or necessary clearances.

Report by Tata Communications Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

[Schedule B read with Regulation 9 (1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, ("PIT Regulations")]

N	Particulars	Details
6.	Reasons recorded in writing for taking action stated above	Upon completion of the investigation undertaken, the AC was informed that the DP had taken requisite measures to ensure compliance with the PIT Code of Conduct of the Company, including through issuing specific written instructions to his PM firm to not deal in the Company's securities, and the trades were carried out without his knowledge and in contradiction to his specific written instructions. Therefore, the trades were an inadvertent violation of the Company's PIT Code without any act/ omission on the part of the DP or, without any intent on the part of DP to violate the Company's PIT Code or the SEBI PIT Regulations. However, though inadvertent, AC determined the trades to be in violation of Company's PIT Code and SEBI PIT Regulations and hence, imposed a penalty on DP, which the AC believes to be commensurate with the nature of non-compliance observed.
7.	Details of the previous instances of violations, if any, since last financial year	None
8.	If any amount collected for Code of Conduct violation(s)	Particulars: Details Name of the transferor: Krishnakumar Natarajan Bank name: ICICI Bank Account number/ IFCI: 000201031421 UTR / Transaction reference number: 271232990 Transaction date: 03 December 2021 Transaction amount: ₹60,580/-
9.	Any other relevant information	NA

Yours faithfully,

For Tata Communications Limited

Zubin Adil Patel Digitally signed by Zubin Adil Patel Date: 2021.12.03 19:17:28 +05'30'

Zubin Adil Patel

Company Secretary & Compliance Officer

PAN: BGAP0670G

Email id: zubin.patel@tatacommunications.com

Date: 03 December 2021

Place: Mumbai