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## **CORPORATE SOCIAL RESPONSIBILITY POLICY**

### **1. PREAMBLE:**

At TRIL IT4 PRIVATE LIMITED ("TRIL" or "the **Company**"), we are committed to Tata Group's vision of Integrating environmental, social and ethical principles into the core business, thereby improving the quality of life of the communities we serve and enhancing long-term stakeholder value. At TRIL, we are sensitive and concerned about the communities and region we are operating. Thus believing that through sustainable measures, we would actively contribute to the Social, Economic and Environmental Development of the Community.

### **2. CSR VISION AND MISSION:**

The Company recognizes its responsibility towards the society and contributes significantly towards the betterment of the local communities it serves.

We believe in creating value for the community we work and empowering our stakeholders by touching the lives of one lakh people by 2025. The said vision- mission is proposed to be achieved by implementing CSR programs in the key areas of Livelihood and Skill development, Healthcare, Environment protection, Social development and relief.

#### Activities undertaken in the past:

The Company and its subsidiaries have a wide geographical stretch covering throughout the nation and has voluntarily initiated numerous CSR activities during its recent past like;

#### Health:

- Organizing awareness sessions on health and hygiene, free health check-ups and blood donation camps in and around the project site.
- Installation of water purification plants at schools near project sites.
- Rural development programmes like support on providing a garbage vehicle and providing ambulance support.

#### Environment Protection:

- Undertaking plantation drives within the communities and schools to bring about an awareness on environmental issues and creating balance ecosystem.

Livelihood:

- Entrepreneurship Development program (EDP) for socio-economically backward youth involved in the construction sector.
- Skill development program for the construction workers.
- An onsite welfare facilitation program for construction workers to improve access to social protection schemes.
- Working towards women empowerment by introducing scholarship program for girls coming from socio-economically challenged backgrounds.

Education:

- Supporting educational institutes and universities in the conducting academic research.

Social Development and Relief:

- Support to Informal Workers of Urban Areas to Combat Covid-19.
- Support on improving medical infrastructure as a response to the Covid- 19 crises in the nation.

**3. DEFINITION ON CSR POLICY:**

This CSR Policy is a statement containing the approach and direction given by the Board of a company, taking into account the recommendations of the CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.

**4. OBJECTIVES OF THE POLICY:**

- Define the operational framework and to provide a pathway for undertaking CSR initiatives for the company.
- The Policy sets out the rules that need to be adhered to while taking up and implementing CSR activities.
- To lay down effective guidelines in carrying out CSR programs by aligning them to the areas mentioned under the schedule 7 of companies Act 2013 and contribute efforts towards meeting larger SDGs (Sustainable Development Goals) 2030.

The Company shall timely ensure appropriate utilization of contribution viz financial and human resources to the benefit of the community at large.

## 5. CSR THRUST AREAS AND FRAMEWORK:

The programs designed towards integrating wider perspectives of SDGs 2030 will reflect on doing a responsible business and invest in Social good.

The CSR Framework developed for the next 3 years, focuses on the following areas of intervention, which are in line with Schedule VII of Companies Act 2013 and beyond business as usual.

<b>LIVELIHOOD AND SKILL DEVELOPMENT</b> <i>(Under Schedule 7, point no. II and SDG 1, 8, 10)</i>	<b>HEALTHCARE</b> <i>(Under Schedule 7, point no. I and SDG 3, 6)</i>	<b>ENVIRONMENT PROTECTION</b> <i>(Under Schedule 7, point no. II and SDG 11, 13)</i>	<b>SOCIAL DEVELOPMENT AND RELIEF</b> <i>(Under Schedule 7, point no. VII/XII and Qualifying overall SDGs and Schedule VII)</i>
<ul style="list-style-type: none"> <li>- Enhancing skill for employability</li> <li>- Mapping existing traditional livelihood patterns and enhancing their scope.</li> <li>- Supporting entrepreneurship development.</li> <li>- E.g. Upskilling and reviving of Bamboo crafts in West Bengal.</li> </ul>	<ul style="list-style-type: none"> <li>- Designing and implementing awareness campaigns around sanitation and hygiene practices.</li> <li>- Addressing vital health issues in the marginalized communities.</li> <li>- E.g. Regular Health awareness session for Construction labours and the communities around.</li> </ul>	<ul style="list-style-type: none"> <li>- Focusing on projects that have sustainable long-term impact and that promotes use of renewable energy and recycling.</li> <li>- Enhancing biodiversity, natural resource management and mitigation of climate change impacts.</li> <li>- E.g. Water Body Restoration in Rural outskirts of Chennai and Solid waste Management project in Bangalore-Rural.</li> </ul>	<ul style="list-style-type: none"> <li>- Special projects to be undertaken basis immediate need and thereby fulfilling the objectives of the policy.</li> <li>- Engaging with communities affected by natural disasters, while meaningfully responding towards strengthening their resilience.</li> <li>- E.g. Covid relief initiatives or contribution to the Prime Minister's</li> </ul>



			National Relief Fund.
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## **6. COMPOSITION OF THE CSR COMMITTEE:**

The Committee shall be constituted with following members only if the CSR expenditure amount to be spent by a company exceeds fifty lakh rupees:

- 1) With minimum three directors of which at least one director shall be an Independent Director from the Board of the Company; or
- 2) With minimum two directors from the Board of the Company, in case the company is not required to appoint an independent director under sub-section (4) of section 149 of the Companies Act 2013 ("the Act").

If the CSR committee is not required to be constituted by the Company as per provisions of the Companies Act, 2013, the Responsibility of CSR Committee as per the provisions of the Companies Act, 2013, be discharged by the Board of Directors of the Company.

## **Mandate of the Corporate Social Responsibility Committee:**

### **As per provisions of Section 135 of the Act read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended), the CSR Committee shall:**

- i. Formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company in the areas or subject specified in Schedule VII;
- ii. Recommend the amount of expenditure to be incurred on the activities;
- iii. Monitor the CSR Policy of the Company from time to time;
- iv. To formulate and recommend to the Board an Annual Action Plan in pursuance of the CSR policy, which shall include the following, namely:-
  - a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act,
  - b) the manner of execution of such projects or programmes,
  - c) the modalities of utilisation of funds and implementation schedules for the projects or programmes,
  - d) monitoring and reporting mechanism for the projects or programmes, and

- e) details of need and impact assessment, if any, for the projects undertaken by the company
- v. Any other matter, which may be considered appropriate by the Committee for furtherance of Company's CSR activities.

**7. ADDITIONAL MANDATE:**

- i. Oversee the company's conduct with regard to its corporate and societal obligations and its reputation as a responsible corporate citizen;
- ii. Oversee activities impacting the quality of life of various stakeholders;
- iii. Monitor the CSR Policy and expenditure of the material subsidiaries (material subsidiary" means a subsidiary whose income or net worth exceeds ten percent of the consolidated income or net worth, respectively, of the Company and its subsidiaries in the immediately preceding financial year).

**8. IMPLEMENTATION PROCEDURE/ ANNUAL ACTION PLAN:**

The CSR programmes will be designed systematically with defined timelines, objectives and deliverables. All the CSR initiatives will have well-defined KPIs to measure impacts on target groups.

Every year Company review the existing programmes and will come out with Action Plan for implementation of each of the CSR projects or programmes, which were approved by the CSR Committee.

The company will collaborate with select NGO/ voluntary organization for the implementation of the programmes. The engagement with the partner will be based on thorough due diligence process and assessing the credibility of the organization.

The Company shall during the financial year i.e. any time between 1<sup>st</sup> April to 31<sup>st</sup> March every year, carry out its above listed CSR activities. The CSR Committee shall, from time to time, decide on the schedule.

The modalities of utilisation of funds and implementation schedules for the projects or programmes:

The funds required for utilization on CSR activities shall be allocated out of the profits of the Company. The Company shall spend on CSR activities an amount of at least two percent of the average net profits, made during the three immediately preceding financial years. The average net profit shall be reckoned in accordance with the provisions of Section 198 of the Act.

However, in the absence of any profits, the Company may still volunteer to undertake/spend on CSR activities.

The Company shall implement the CSR activities either on its own or by contributing in form of donation to a registered trust / society.

The Committee may from time to time recommend selecting and implementing any of the CSR activities enumerated above and to encourage employees to voluntarily participate in such activities toward society's betterment and overall well-being.

#### **9. MONITORING AND REPORTING MECHANISM:**

The Committee may from time to time monitor proper implementation of its CSR activities, either by itself or through appointed authorized representative or by appointing independent agency or as it may deemed fit. The concerned person shall supervise and submit a report, containing details on implementation of the CSR activities, to the CSR Committee of the Board.

Details of Impact Assessment, if any, undertaken by the Company:

The Company may on its own or engage the services of professional / independent agency in order to do the impact assessment of selected or applicable projects or programmes on a periodic basis, as may be required from time to time.

#### **10. POLICY GUIDELINES AND REVIEW**

This CSR Policy has been formulated as per prevailing provisions of the Companies Act, 2013 (as amended), the Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended) and after taking into considerations of Clarifications / FAQ issued by the Ministry



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of Corporate Affairs (MCA) from time to time. However, if, due to subsequent changes in the law, a particular part thereof may become inconsistent with the law, in such case the provisions of the law will prevail.

This CSR policy document will be reviewed from time to time. Any changes, if necessary will be approved by the Board.