

CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR) of TMILL

Tata Group Core Purpose:

To improve the quality of life of the communities we serve through long term stakeholder value creation.

Philosophy:

Our Corporate Social Responsibility (CSR) activities are designed to:

- Promote sustainable and equitable development so as to improve the quality of life of the people in the communities in and around the geographies we operate in.
- Provide opportunities for our employees to contribute to these efforts through volunteering and engagement.

Focus Areas:

- 1) To improve the quality of life amongst socially and economically backward communities.
- 2) Promoting education including special education and employment enhancing vocational skills.
- 3) Promoting preventive healthcare and sanitation and making available safe drinking water.
- 4) Ensuring environmental sustainability through protection of flora and fauna, conservation of natural resources and animal welfare.

Approach:

- **Identification of Key Communities** – The local unit CSR teams would identify the target beneficiaries or key communities who are targeted to be served through its CSR initiatives.
- **Need Identification** – The local unit CSR teams of the Company would engage with and identify the needs of the target communities in a participatory manner in consultation with the communities. Subsequently, The Apex CSR Steering committee would arrive on a consensus and obtain necessary approval from the CSR committee at the board level.
- **Annual Plan** – The Company would prepare an Annual CSR Plan along with relevant timelines, budget and modalities for implementation, which would be aligned with Schedule VII of the Companies Act, 2013.
- **Partnerships** – The Company would collaborate with partners, as necessary, who bring in complementary resources, expertise and influence that would strengthen the company's CSR initiatives.
- **Training** – The Company would train its CSR personnel from time to time or as required for improving their CSR capabilities.
- **Building Awareness** – The Company would create consciousness through a process of continuous dialogue, initiatives and collaboration.

Delivery Mechanism:

- TMILL would implement its CSR initiatives both through direct as well as in collaboration with its suitable partners.

- **Direct Intervention:**

The Company will constitute local CSR teams in each operating unit. The CSR team will develop an Annual CSR Plan with timelines, budget and modalities for implementation for the respective operating units based on the relevant opportunities in the region, keeping in mind TMILL's Focus Areas.

The Company shall also nominate a CSR Champion at each operating unit, who, in coordination with the CSR teams, will oversee the day-to-day management and implementation of the CSR activities.

- **Partnerships:**

The Company might partner with other Tata Group companies and like-minded corporate organizations, funding agencies, governmental and non-government organizations, to further its CSR objectives, based on the following selection criteria for NGO/Society/Trust:

- Registered as per Government legislations
- Minimum track record of 3 years
- Established financial track record.
- Non-political identity
- Objectives alignment
- Access to the target community
- Infrastructure and team for effective execution of initiatives.
- Process of utilization of fund for beneficiaries

- The Company would provide resources in a phased manner to implement the planned activities as linked with progress of the project.

Note: Any surpluses arising out of CSR projects or programs or activities shall not form a part of the business profits of a company.

Evaluation & Improvement:

The Company would endeavour to improve its processes with continuous evaluations through the following mechanisms:

- Taking periodic feedback from stakeholders and target communities.
- Adopting Best Practices from within the Tata Group and outside.
- Sharing its learnings and experience across its units.
- Third Party audit of all CSR activities.

Governance Structure:

- As on the date of adoption of this Policy, the composition of the CSR Committee of the Board is as below:

Mr. Sandipan Chakravorty	Non-executive, Non-Independent	Chairman
Mr. Dipak Banerjee	Non-executive, Independent	Member
Mr. Peeyush Gupta	Non-executive, Non-Independent	Member
Mr. R N Murthy	Executive, Non-independent	Member

- The Apex CSR Steering Committee chaired by the Managing Director and comprising the senior management team of TMILL, the local unit CSR teams and the CSR Champions will do a quarterly review of the activities and monitor achievements against targets set at the beginning of the year.

Review of CSR activities:

The Apex CSR Steering Committee would discuss, review and recommend the CSR Policy to the Board for approval. The CSR Committee would meet ordinarily once in every quarter, or at such intervals as the Board may deem appropriate, to review the progress of the activities undertaken in the Annual CSR plan.

The Board of Directors of TMILL adopts this policy, as recommended by the CSR Committee of the Board, at their respective meetings held on this 28 day of October, 2014.