Corporate Social Responsibility (CSR) Policy - TMFL Group

(As approved by the Board at its meeting held on July 31, 2015)

The Tata group's core purpose is to improve the quality of life of the communities it serves globally, through long-term stakeholder value creation. The Group is known for its tradition of philanthropy and community service and we are guided by our founder, Mr. Jamshetji Tata, who once said "in a free enterprise, the community is not just another stakeholder in the business but is, in fact, the very purpose of its existence".

At TMFL Group, we sincerely believe that the actions of the organization and its community are highly inter-dependent and we believe that social responsibility is not just a corporate obligation that has to be carried out but also integral to the way we operate. Our CSR approach was seeded in FY 10-11 with an objective of being a Good Corporate Citizen. It was deployed through two programs – a) Think Green – aimed at reducing our impact on environment, and b) iCare – aimed at supporting society and key communities. In FY 13-14, we did a risk assessment to analyze TMFL's impact on Society and Environment and prioritized following focus areas: a) Environmental impact – Electricity consumption, Official Air travel and Paper consumption, b) Societal impact – Volunteering programs around Offices. We started annual 'TMFL Sustainability Week' program in FY13-14 to create awareness about environment and societal support amongst employees and their family members. Approximately 80% employees participate in at least 1 program every year. Based on the CSR spend provisions of the new Companies Act, we have put together a revised CSR Strategy in 2015. The budget for CSR spend in FY 15-16 is 2.09 Crores for TMFL and Zero for TMFSL and our plan is to grant 75 Lacs for CSR through the identified projects detailed in the document.

Objective: TMFL Group is committed to ensuring the social wellbeing of the communities through Corporate Social Responsibilities in alignment with Tata Group Focus Area as well as TMFL Group values. This policy is linked to our core value of "Care & Concern" for our Communities and Environment.

List of Programmes: TMFL Group shall engage with the community by undertaking the following CSR initiatives based on the CSR thrust area, Tata Group focus area and TMFL Group values (Care & Concern).

CCD		CCD Duoiset	Drive	Ref:	Implementation Schedule				
CSR Theme	CSR Project	CSR Project Task	Throug h	Schedul e VII	Q1:151 6	Q2:151 6	Q3:151 6	Q4:151 6	
	Project "Uddan" - Enabling Girl Child from backward areas by supporting them from Adolescence to Livelihood	Basic hygiene and health care for Girl Child	NGO	i		✓	✓	√	
iCare		Confidence building amongst Girl Child as well as Community on gender equality	NGO	iii		√	√	√	
		Generate motivation	NGO	ii			✓	√	

		for primary, secondary and higher education						
		Developmen t of local sports for Girl Child through sports for excellence program	NGO	vii				✓
		Coaching classes and remedial classes for girl child	NGO	ii			√	√
		Scholarship program from IX to XII	NGO	ii			✓	√
		Livelihood program: Skill development and establishmen t of Girl Youth from the same community	NGO	ii				✓
Health	Blood Donation	Organize periodic blood donation camp at TMFL Group offices	NGO	i	✓		✓	
Environme	Sapling	Mangrove tree plantation near costal area at Mumbai	NGO	iv	~	√	✓	√
nt	plantation	Sapling plantation across identified areas in four Regions	Agency	iv	~	✓	✓	✓

Community and Geography: The CSR projects will be carried out in and around the TMFL Group offices. As part of Project Uddan, our main focus area is the backward belts Bhandara District of Maharashtra State.

Brief of Programmes:

"Uddan" - Enabling Girl Child from backward areas by supporting them from Adolescence to Livelihood We all are aware that overall improvement of girl child is one of the concern areas in our Nation. The reason for the same is the huge bias which exists against the development and empowerment of girl situated in backward areas. This leads to the girl child being denied the rights to access equal opportunities of healthy childhood, higher education, equal feeding resulting into disease like anaemia etc. Also unhygienic practices, mental and physical abuse, early marriage results in the adolescent growing up to become a weak women without the skills with which she can get herself a sustainable livelihood leading to economic and social deprivation. Our project addresses most of these concern areas by covering aspects of behavioural change, community system support, education and skill building for livelihood.

<u>Tree Plantation:</u> The Tree Plantation initiative is aimed at offsetting the carbon generated out of our Operations and covers as pects of Mangrove plantation and Sapling Plantation. After "Tsunami" India realized the importance of Mangrove plantation. It is widely known that cyclones and tsunamis mostly originate from the sea and move towards the land, the wind velocity gets reduced, reflected, deflected and dissipated, when they pass through the coastal forests, mangroves, offshore islands, coral reefs, head lands, sea cliffs, sand pits, mudflats, sand dunes, creeks etc. Also mangroves helps to source abundance of brackish water fish, shrimps, crabs, Honey, beeswax and tannin, which provided for requirements of both local and urban consumption.

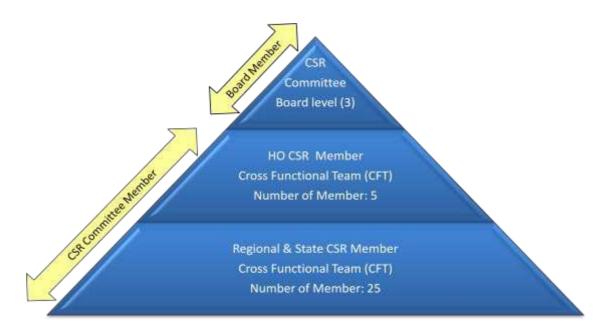
<u>Blood Donation (Blood Doh Nation):</u> The availability of blood unit is a major concern area for our health department of India. In current scenario one unit of blood can save 3 lives. To reduce the crisis of the same periodic conduct of Blood Donation camp is one of our programs. Also it helps donor by balancing iron level in our blood and better blood flow system in the body which lead to live a healthy life.

Linkage between TMFL Group CSR thrust area and schedule vii:

			iCa	ire		Think Green
S.No.	Schedule VII	Schedule VII Schedule VII Development of Girls (Uddan) Health and Hygiene of Girl Child		Skill development for livelihood of Girls (Uddan)	Blood Donation Camps	Tree Plantation
i	Eradication of hunger, malnutrition, promoting healthcare, safe drinking water		√		√	
ii	Promotion of education and employment enhancing Vocational skills	√		✓		

	Promoting gender			
	equality, women	_		
iii	empowerment, focus on	✓		
	socially backward -			
	aligned with TAAP			
	Environmental			
	Sustainability –			
iv	biodiversity, species			\checkmark
	protection and			
	conservation			
	Protection of national			
v	heritage, art and culture,			
\ \ \	development of			
	traditional arts			
	Measures for Armed			
vi	force veterans, war			
vi	widows and their			
	dependents			
	Promotion of Rural			
vii	sports, Paralympics			
VII	sports – something that			
	has national association			
	Contribution to PM's			
viii	relief fund/ other such			
	central funds			
	Contribution to			
	technology incubators			
ix	within institutions			
	approved by Central			
	government			
×	Rural development			
	projects			

CSR Governance: Committee and its roles and responsibilities



CSR Committee	Designation
Ms. Vedika Bhandarkar	Independent Director
	Executive Director (Commercial
Mr. Ravi Pisharody	Vehicles), TML
Mr. Shyam Mani	MD & CEO, TMFL Group

Responsibilities:

<u>Board:</u> The Board will facilitate creation of CSR committee and will ensure that the CSR activities planned in this policy are incompliance to Schedule VII of the Companies Act 2013. The Board would also ensure that every financial year, funds committed for CSR are utilized effectively, monitored and reported to the MCA in the required format.

<u>CSR Committee:</u> The Committees will have the responsibility of formulating CSR Policy to be approved by the Board, recommend CSR Programmes, allocate budgets, monitor the implementation status and utilization of funds. They will also prepare Annual Report of the CSR Programmes, stating clearly the results of social audit and the resultant social impact. Gaps in implementation of the planned CSR Programmes will be reported with necessary corrective actions. The Committees are authorised to take professional support from individuals or organisations having expertise in related fields.

<u>CSR Regional & State Members:</u> Members are responsible for facilitate implementation, monitoring and reporting of each activities going on in their respective locations.

Monitoring:

- Level 1: Local reviews by NGO through execution MIS and exception report from execution team
- Level 2: TMFL CSR Team will review the progress, effectiveness, action plans and support required on a monthly basis.
- Level 3: Internal audit team will do audit on spend and outcomes on a quarterly basis
- Level 4: Board committee review will take place on a periodical basis as per statutory requirement/ need based.

Reporting Mechanism and Format: CSR committee shall review the reporting requirement under 2013 Act and the same to be included in the Board's report. Such report will be shared with the Stakeholders as well as put up on the website of the company in prescribed format.

• Reports to Ministry of Corporate Affairs (MCA): Once in a year

S No	CSR project/ activity	Sector	Project/ programme	Geography (Local Area / State / Others)	Amount outlay (budget) project/ programme wise	Amount spent by project / spend up programme (Direct or Overhead) Cumulative spend up to report- ing period		Amount spent direct/ through implementing agency

• Reports to Board by CSR Committee: Half yearly

S N o	CSR projec t/ activit y	Sect or	Project/ program me	Geograp hy (Local Area / State / Others)	Amount outlay (budget) project/ program me wise	Amount spent by project / program me (Direct or Overhead)	Cumulati ve spend up to report- ing period	Amount spent direct/ through implementi ng agency	Agenc y Detail s	Benef it from the proje ct

• Internal Audit Report: Half yearly

S N o	CSR projec t/ activit y	Sect or	Project/ program me	Geograp hy (Local Area / State / Others)	Amount outlay (budget) project/ program me wise	Amount spent by project / program me (Direct or Overhea d)	Cumulati ve spend up to report- ing period	Amount spent direct/ through implement ing agency	Remarks / Observati on from Audit Team

Statutory Amendments: Any amendments to the provision of the 2013 Act relating to CSR and Company's CSR policy shall be deemed to be incorporated in this policy and the CSR committee will be authorised to do all the necessary acts to give effects to such changes.