

TIL INFOPARK LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

Preamble:

The term “Corporate Social Responsibility” (CSR) has gained much importance in the recent days due to many reasons like regulatory impositions, increasing social awareness of the corporates, changing attitude of the corporate world to make society a part of its environment etc.

TRIL Infopark Limited (“TIL” or “the Company”) possess a comprehensive view and the term ‘CSR’ is not merely restricted to allocation of funds for social activities; but further extends in returning the society what it has taken it from as well as develop the healthy and sustainable relationship between TIL and all the components of the society with which it is dealing directly or indirectly.

Introduction:

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 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.

Words and expressions used and not defined in this Policy but defined in the Companies Act, 2013 (as amended), the Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended) and Clarifications / FAQ issued by the Ministry of Corporate Affairs (MCA), shall have the same meanings respectively assigned to them thereunder.

Objectives:

The Company recognizes its responsibility towards the society and contributes significantly towards the betterment of the local communities it serves. The Company shall timely ensure appropriate utilization of contribution viz financial and human resources to the benefit of the community at large. In the light of the above various efforts have been made by the company to make a difference.

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

TIL INFOPARK LIMITED

principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.

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

TIL INFOPARK LIMITED

- v. Any other matter which may be considered appropriate by the Committee for furtherance of Company's CSR activities.

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).

Recommended sectors for CSR activities:

- i. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitization including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- ii. Promoting education, including special education and employment enhancing vocational skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- iii. Promoting gender equality, empowering women, setting homes and hostels for women and orphans, setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- iv. Ensuing environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;
- v. Protection of natural heritage, art and culture, including restoration of buildings and sites of historical importance and works of art, setting up public libraries, promotion and development of traditional arts and handicrafts;
- vi. Measures for the benefits of armed forces veterans, war widows and their dependents Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;

TIL INFOPARK LIMITED

- vii. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- viii. Contribution to the Prime Ministers' National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by Central Government for socio-economic development and relief and welfare of Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- ix. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- x. Rural Development Projects.
- xi. slum area development. (Explanation.- For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.)
- xii. disaster management, including relief, rehabilitation and reconstruction activities.

Any such activities which may be included or any of the abovementioned activities that may be modified or removed or replaced by Central Government or Ministry of Corporate affairs by amendment/clarification to the Schedule VII of the Act.

Scope of activities covered:

The scope of activities of the Company will not only restrict to providing funds for promoting aforementioned activities, but also in creating opportunities for the locals and others which will make them independent and capable of raising their livelihood.

Implementation Procedure/ Annual Action Plan:

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

CSR Committee will review on regular basis the implementation of projects or programmes.

CSR Schedule:

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

TIL INFOPARK LIMITED

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.

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.