

CSR Policy

Corporate Social Responsibility Policy (CSR) of Travancore Titanium Products Limited

Preamble

CSR is an institutionalized endeavour to contribute to social well being for the benefit of the downtrodden and the underprivileged and also for the causes aimed at general good. It encompasses all activities through which an organization impacts the quality of life in general and strives for the sustenance of environmental good. CSR is not merely about undertaking certain charitable or philanthropic activities but is aimed at aligning the business objects with the overall social goals.

Purpose of the Policy

The Policy outlines the type and scope of activities to be undertaken as part of the Company's commitment to ensuring the overall wellbeing of the society, people and the environment while aligning the same with the general policy prescriptions of the Government of India in the matter of growth and development. It also is aimed at complying with the requirements of Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility) Rules, 2014 and allied notifications issued by the Government of India.

The Governing Authority

The overall administration of CSR Policy of the Company shall vest in the Board of Directors with the Board having powers to make amendments in the Policy from time to time on the recommendation of the CSR Committee of the Board. However, for taking decisions with regard to the scope, manner of implementation, quantum of expenditure within the limits approved by the Board, timeframe etc with regard to activities specified in the Policy or those generally approved by the Board, the Committee would be the competent authority.

The CSR Committee

The Board of Directors of the Company has constituted a Board level CSR Committee in compliance with Section 135 of Companies Act, 2013.

Scope of Activities

The activities to be undertaken by the Company are broadly covered in the activities specified in Schedule VII of the Companies Act, 2013 viz.

- (i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care" and sanitation [including contribution to the Swachh 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 vocation skills especially among children, women, elderly and the differently able and livelihood enhancement projects.
- (iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- (iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, 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 national 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 art and handicrafts;
- (vi) measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports
- (viii) contribution to the prime minister's national relief fund or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, 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 govt.
- (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.]

The specific activities that may be undertaken by the Company within the above parameters are as follows:

- i. Provision of solar powered street lights—to cover under clauses (iv) and (x)
- ii. Provision of food to orphanages/old age homes - clause (i)
- iii. Planting of trees/saplings – clause (iv)
- iv. Donations to schools, vocational institutions etc.– clauses (ii) and (iii)
- v. Organising blood donation camps, eye testing camps etc.–clause (i)
- vi. Setting up a library for the public –clause (v)
- vii. Providing RO plants to schools, old age homes etc.– clause (i)
- viii. Construction of toilets etc. –clause (i)
- ix. Training centre for promotion of nationally recognised sports –clause (vii)
- x. Electrification of villages, especially through solar energy– clause (x)
- xi. Healthcare and sanitation facilities for villagers especially women folk–clause (i)

- xii. Provision of free medical camps, medical consultancy, clinics etc. –clause (i)
- xiii. Providing financial assistance for fees, maintenance expenses and provision of various amenities to the schools and charitable trusts meant for the specially abled/differently abled/mentally unsound children– clause (ii).
- xiv. Providing financial assistance to people affected by Cyclone ‘Ockhi’ that hit the Southern coasts during December 2017 – clause (i), (ii), (x) or (xi) as the case may be¹
- xv. Providing medical insurance cover to people meeting certain predefined criteria living in the coastal areas in the vicinity of the Company – clause (i)²
- xvi. *Any other activities as may be decided by the Board/Committee from time to time*

^{1 & 2} *As suggested by the CSR Committee on 26/12/2017 & approved by the Board on 27/03/2018*

The Company will ensure that:

- a) The projects/activities undertaken are not discriminatory in nature and do not have any political or religious affiliations.
- b) The programmes will be confined to the areas prescribed in the Policy or as decided by the CSR Committee.
- c) The Company will also give due consideration to the suggestions given by employees and employee associations/trade unions with regard to the type of activities to be undertaken and the areas of operation.

Places of operation

The areas of operation shall be confined to the territory of India only. Further, since the Company is located in the coastal area and the people living in the vicinity are more likely to be affected by the industrial activities of the Company, preference would be given to the nearby areas for undertaking CSR activities. The CSR Committee shall decide the geographical areas to which CSR activities shall be extended to.

CSR Budget

The overall CSR budget for each year shall be fixed by the Board of Directors, subject to not being lower than 2% of the average annual net profit as determined under the provisions of Section 198 of the Companies Act and the Rules, of preceding three years. The Company will strive to spend the entire CSR allocation during the relevant year itself subject to the supervision of Board of Directors and the CSR Committee of the Board.

Deciding authority

The CSR Committee shall have power to take decisions with regard to the nature of activities, scope, manner of implementation, quantum of expenditure within the limits approved by the Board, time frame etc. with regard to activities specified in the Policy or those generally approved

by the Board keeping in view the permissible CSR activities. The MD shall have independent financial powers to the tune of ₹50000 per project/activity. However, beyond that the financial powers would vest in the Board subject to recommendation by the CSR Committee.

Implementing Authority

The projects cleared by the CSR Committee or the Board as the case may be shall be implemented in the manner and within the time frame as prescribed by the approving authority. The overall responsibility of implementation shall vest with the MD of the Company or such other executives/committee of executives whom he may authorise.

Monitoring

The CSR Committee will institute a transparent monitoring mechanism for ensuring effective monitoring of the CSR activities to be undertaken by the Company. The MD would depute such officers as he may deem fit, to undertake visits to the project site, conduct meetings, report progress etc. Periodical reporting about the progress as may be prescribed shall be given to the CSR Committee.

Reporting/Disclosure

Necessary disclosure/reporting shall be made in the annual report/Board's report briefly about the CSR activities undertaken during the year including the particulars of the amount unspent and the reasons there of. The reporting format shall be as per the Annexure to the Companies (Corporate Social Responsibility Policy) Rules, 2014. The contents of this Policy and the details as per the above Annexure shall be placed on the website of the Company www.travancoretitanium.com.

Renewal of the Policy

This Policy was approved and recommended by the CSR Committee of the Board in its meeting held on December 26, 2017 and was approved and adopted by the Board of Directors in its meeting held on March 27, 2018. The Policy will be amended from time to time by the Board of Directors pursuant to the recommendation made by the CSR Committee. The CSR Policy of the Company will mean the Policy that is current and as modified from time to time.