



TINNA TRADE LIMITED CORPORATE SOCIAL RESPONSIBILITY POLICY

1) INTRODUCTION

Tinna Trade Limited (TTL) was set up in 2009 and is a part of the well diversified TINNA GROUP of Companies established four decades ago. Tinna Trade is a 100% subsidiary of Tinna Rubber & Infrastructure Limited. In June 2013, the company was renamed as TINNA TRADE PVT LTD. The company has been playing a leading role in bringing agriculture produce directly from producers to end users. In a short period of time, TTL has carved an important place in agri-business and is consistently delivering outstanding performance. TTL has been awarded as the second fastest growing mid-sized company in India by INC.500. Due to its stellar reputation, the company continues to be a PARTNER OF CHOICE among leading International and domestic agri trading & processing companies.

2) FOREWORD

At TTL, our corporate vision is to create a more inclusive and sustainable Environment by harnessing India's AGRI BUSINESS potential and establishes a leadership role in trading, handling and distribution.

3) PURPOSE

The main objective of this policy is to make CSR a key business process for sustainable development of the society. It lays down the guidelines and mechanism for undertaking CSR programs in alignment with the Section 135 of the Companies act 2013. To directly/indirectly undertake projects/programs, which will enhance the quality of life and economic well-being of the communities, in and around our business operation units and the society at large. Lastly, to generate Goodwill and Recognition among all stakeholders of the company.

4) STAKEHOLDER ENGAGEMENT

The Policy applies to all relevant internal and external stakeholders of the Company for CSR. The Company shall engage with the following set of stakeholders to involve them in all stages of meeting its CSR commitments and discharging responsibilities, from policy formulation to practices.

STAKEHOLDERS	ROLE/FUNCTIONS of STAKEHOLDERS
INTERNAL STAKEHOLDERS	
Management	Encourage Innovation and Expansion, Ensure compliance and adherence
Employees	Volunteering
EXTERNAL STAKEHOLDERS	
Government	Co-operate with Local government agencies, provide support to existing



	schemes
Society	Provide benefits to the Target Group through various projects/programs
NGO Partnerships	Partner with NGO's/Implementing agencies whose principals are in alignment with the company's CSR Policy

5) POLICY GUIDELINES

- a) As stated under section 135 of the companies Act 2013, a company can undertake its CSR activities through its own personnel/HR department or through a registered trust or society. If the entity through which the CSR activities are being undertaken is not established by the company or its holding, subsidiary or associate company, such entity would need to have an established track record of three years undertaking similar activities.
- b) TTL would give preference to the local areas where it operates, for carrying out its planned CSR activities, but not limited to it.
- c) The company shall undertake the CSR projects or programs in accordance with the provisions of Section 135, with Schedule VII of the Companies Act 2013 and rules made thereafter, with the approval of Board of Directors on the recommendation of the CSR Committee.
- d) The activities that are exclusively for the benefit of the employees or their family members would not be considered as part of its CSR activities.
- e) The company will make timely updates on the activities and projects being undertaken under its CSR campaign, made available on the company website.

6) SCOPE

In line with its vision, the company through its CSR initiatives is committed to improve the social and economic development of the community and geographical areas, with focus on the local areas around its business operations. This will include skill development, health, social welfare and education, especially targeting the weaker and deprived sections of the society.

7) THRUST AREAS

TTL, in alignment with Schedule VII of the CSR Act, the company will undertake its CSR programs as under:

- a) Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- b) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- c) 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;



- d) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water;
- e) 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 arts and handicrafts;
- f) Measures for the benefit of armed forces veterans, war widows and their dependents;
- g) Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
- h) Contribution to the Prime Ministers' National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- i) Contributions or funds provided to technology incubators located within academic institution which are approved by the Central Government;
- j) Rural development projects

8) GOVERNANCE

The Board of Directors has constituted the Corporate Social Responsibility Committee of the Board (CSR Committee). The composition is as follows.

Member Name	Designation
Mr. Subhash Chandra Jain	Independent Director
Mr. Ashish Madan	Independent Director
Mr. Gaurav Sekhri	Managing Director

The Board and the CSR Committee shall assume specific rules in order to ensure effective execution of the projects

BOARD OF DIRECTORS

- a) Constitute a CSR Committee of the Board through a Board Resolution, with a defined number and date.
- b) Approve CSR Policy of the company as formulated by the CSR committee, through a board resolution, with a defined number and date.
- c) Disclose in its annual report, as per section 134 (3) (o), the names of the members of the CSR committee, the content of the CSR policy and **mandatory Annual Report on CSR activities as per the prescribed format under the CSR Rules.**
- d) Ensure that activities included by the company in its Corporate Social Responsibility Policy are in accordance with the activities listed in Schedule VII of the Act;
- e) Make certain that the activities included in Corporate Social Responsibility Policy of the company are undertaken by the company
- f) Ensure that in every financial year, at least 2% of the average net profit is spent on approved CSR activities.



- g) The Board of Directors on its own and/or as per the recommendations of the CSR Committee can amend this policy, as and when required as deemed fit. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the Regulations on the subject as may be issued from the relevant statutory authorities, from time to time

BOARD LEVEL CSR COMMITTEE

- a) Formulate CSR policy and identify activities to be undertaken as specified in Schedule VII of the Companies act 2013.
- b) The detailed list of activities with allocated expenditure in the prescribed format to be appended to the policy.
- c) Report back to the board of directors for approval of the CSR policy.
- d) Regularly monitor the implementation of the CSR policy.
- e) Change/modify the CSR policy as per the feedback from the implementation of the existing policy.
- f) Create transparent monitoring mechanisms for implementation of CSR initiatives

9) BUDGET

A specific budget is allocated for CSR activities and spending on CSR activities shall not be less than 2% of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of this policy. However, initially the Company may not be able to spend such amount because of unavailability of resources, in such case the Board shall specify the reasons for not spending the amount.

Up to 5% (five percent) of the CSR commitment shall be spent towards capacity building, administrative costs, personnel costs and other CSR costs.

10) MONITORING

- a) Board Level Committee on CSR shall review the implementation of CSR activities in every six months and recommend the amount of expenditure to be incurred on CSR activities.
- b) The CSR committee shall monitor the Corporate Social Responsibility policy from time to time. The CSR Team shall also review the progress every three month and place a progress report before the CSR Committee. The report to cover, progress with timeline and budget, number of beneficiaries reached, performance agency engaged, corrective measures taken for deviation (if any), estimated amount to be utilized till year end.
- c) Routine reviews shall be undertaken by the Corporate CSR Team and NGO partners by using the MIS as an integral tool for monitoring.

11) REPORTING

TTL shall publish an annual report on CSR containing required particulars specified in the prescribed format for the annual report in the Companies Act 2013. Reporting will constitute an integral part of our CSR initiative as we remain committed to be transparent and accountable to our stakeholders. All CSR program details will be easily available and timely updated on the Company's website.