



TIDEL PARK COIMBATORE LTD. (TPCL)
TPCL Corporate Social Responsibility Policy

1. About TPCL

As per GO (Ms.) 49 dated 21.02.2007 of Industries (IT) Dept., TIDEL Park Coimbatore Limited (TPCL) has been established as a JV of TIDCO, ELCOT, TIDEL and STPI, with the objective of promoting IT / ITES and employment opportunities in the Tier-II City of Coimbatore in Tamilnadu. TPCL as Co-Developer of the Special Economic Zone established by ELCOT in Coimbatore is in the business of leasing out space for IT / ITeS businesses.

2. CSR Objectives

Mooted with the objective of promoting employment in Tier-II Cities, TPCL recognizes that its business activities have direct and indirect impact on the society. TPCL shall undertake CSR activities to create a meaningful and lasting impact on the communities all over the State of Tamilnadu by helping them transcend barriers of socio-economic development.

TPCL shall plan & implement the CSR projects/activities as broadly indicated in **Annexure – A** and they shall be compliant with the provisions of the Act and rules made there under and will be in line with Schedule VII to the Act. The Company may consult/enlist enabling organizations and regulatory bodies including Government local bodies/Departments etc. to assist it in carrying out its CSR projects.

3. Constitution of CSR Committee and Formulation of CSR Policy

In accordance with Section 135 of the Act and rules made there under, the Company has duly constituted Corporate Social Responsibility Committee with the following directors:

S.No.	Name	Position
1.	Managing Director, ELCOT	Chairman
2.	Director, STPI	Member
3.	Tmt. Aruna Thangaraj Independent Director	Member

4. CSR Coordinating Team

CSR Coordinating team shall consist of the following members:

1. Chief Financial Officer
2. Chief Operating Officer
3. Company Secretary
4. Assistant Manager (Civil)

CSR Coordinating team shall meet at such intervals as required and shall be responsible for:

- a. Identifying & screening the CSR project proposals to be submitted for Managing Director's approval before submission to CSR Committee and Board.
- b. Implementing & Monitoring the CSR activities approved by the CSR Committee and Board.
- c. Reporting to the CSR Committee on the progress on CSR projects and status of CSR expenditure as and when deemed required.

CFO shall chair the CSR Co-ordinating meeting. The Co-ordinating team will make such recommendations on the proposals received to the Managing Director for his approval which then will be placed before the CSR Committee and Board for approval.

5. CSR BUDGET

The total budget for the CSR projects will be calculated on the basis of 2% of average 3 years' net profit before tax.

The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year. Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy.

Where a company spends an amount in excess of requirement provided under sub-section (5) of section 135, such excess amount may be set off against the requirement to spend under sub-section (5) of section 135 up to immediate succeeding three financial years subject to the conditions that:

- (i) The excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, in pursuance of sub-rule (2) of this rule.
- (ii) The Board of the company shall pass a resolution to that effect.

6. CSR IMPLEMENTING AGENCIES

CSR Expenditure may be incurred as direct expenditure or through:

- a) Contribution to Government agencies for specific programs.
- b) Contributions to recognized, reputable organizations with certified audited statements.

Provided all the aforesaid entities fall within the ambit of the following categories:

- a) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961, established by the company, either singly or along with any other company, or
- b) a Company established under Section 8 of the Act or a registered trust or a registered society, established by the Central or State Government; or
- c) any entity established under an Act of Parliament or a State legislature; or
- d) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

In case CSR Programmes are implemented through aforesaid entities, the programmes to be undertaken by those entities will be specified, and it will be ensured that such entities are registered with the Ministry of Corporate Affairs for carrying out CSR activities.

The Chief Financial Officer shall certify to the Board that the funds disbursed for CSR projects/activities have been utilized for the purposes and in the manner as approved by the Board of Directors of the Company.

7. CSR Monitoring

In case of ongoing projects, as defined under the Act and the Rules there under, the CSR Coordinating team shall monitor the implementation of project with respect to approved timelines, year-wise allocation and Board of Directors shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.

In the event of any inconsistency between this policy and the applicable laws, the applicable laws will prevail.

This policy will be reviewed by the Board, on the recommendation of the CSR Committee as and when deemed necessary.

Annexure – A

Sl.No.	Activities as per Schedule VII of the Companies Act 2013	CSR projects / programs / activities proposed to be taken up by TPCL
(i)	Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.	Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and 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 abled and livelihood enhancement projects.	Promoting education; including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled 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.	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

Sl.No.	Activities as per Schedule VII of the Companies Act 2013	CSR projects / programs / activities proposed to be taken up by TPCL
(iv)	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 including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.	Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining of quality of soil, air and water.
(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;	Providing public libraries for the villages.
(vi)	Measures for the benefit 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 widow;	No activity is proposed under this head at present
(vii)	Training to promote rural sports, nationally recognized sports, paralympic sports and olympic sports	Training to promote rural sports, nationally recognized sports, and Paralympics sports and Olympic sports

Sl.No.	Activities as per Schedule VII of the Companies Act 2013	CSR projects / programs / activities proposed to be taken up by TPCL
(viii)	Contribution to the prime minister's national relief fund 8[or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES 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;	Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Governments for socio- economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
(ix)	(a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and	No activity is proposed under this head at present
	(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals;	No activity is proposed under this head at present

	<p>Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organization (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs)</p>	
(x)	Rural development projects	Rural development projects
(xi)	<p>Slum area development.</p> <p>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.</p>	Slum area development
(xii)	Disaster management, including relief, rehabilitation and reconstruction activities.	Disaster management, including relief, rehabilitation, and reconstruction activities