CORPORATE SOCIAL RESPONSIBILITY POLICY

Approved on 4th November 2014
Revised on 29th April 2019

OBJECTIVE

Trent Limited outlines its Corporate Social Responsibility (CSR) policy that integrates economic progress and social commitment. It aspires to always fuse its business values, cultural pillars and operating principles to exceed the expectations of our customers, employees, partners, investors, communities and the wider society.

Our core values form an integral part of our corporate social responsibility programmes and aim towards responsibly improving the quality of life of our stakeholders.

Tata group Core Purpose: To improve the quality of life of the communities we serve through long term stakeholder value creation.

It may be noted that the policy is aligned under the following guidelines:

- The requirements of Clause 135 of the Companies Act, 2013 and the corresponding Rules.
- Schedule VII of the Companies Act, 2013
- In coherence with the overall long-term Tata group CSR strategy and values

SCOPE:

This policy comprises a set of rules adopted by Trent’s Board of Directors and the CSR committee which applies to all employees of Trent Limited and to all other individuals associated with Company.

These rules set the standards for the way we interact with society at large and the environment around us. They may be supplemented from time to time by additional policy statements and guidelines.
DEFINITION

Corporate Social Responsibility commonly known as CSR programs would be defined as per the activities designed to:

- Serve – society, mainly in the locations where we operate or have a significant presence.
- Create a significant and sustained impact on communities affected by our businesses.
- Provide opportunities for Trent employees to contribute to these efforts through volunteering.

Resources

We propose to deploy the following resources for our CSR activities:

- **Funds:** At the minimum, what is required by law (2% of average net profits of the past 3 years as per the Companies Act, 2013 for companies operating in India)
- **Expertise:** Our employees’ expertise would be leveraged to the optimum through structured volunteering programmes.
- **Products and services:** The products and services, owned and governed by the Company would be made to be associated to impact necessary activities.
- **Facilities:** All facilities necessary for implementation of the activities shall be made available at our corporate office and at the stores that we operate.

*Any surpluses arising out of CSR projects or programmes or activities shall not form a part of the business profits of the Company.*

Sectors and issues

Under the framework of this policy, the sectors and issues focused by the Company shall fall under the purview of activities specified in the (modified) Schedule VII of the Companies Act, 2013 and those approved by the CSR Committee and the Board.

The CSR policy and strategy would include the 4 GFIs – Skills, Water, Governance, and Education as outlined by the Tata Group.

The policy also considers abiding and aligning its focus areas as per the guidelines mentioned under the Affirmative Action Initiative, commonly referred to within the Tata group as TAAP (Tata Affirmative Action Programme). The focus areas are Education, Employment, Employability, Health and Nutrition and other key allied social initiatives with an aim to improve the quality of life of those we are associated with.
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*NOTE- TATA Affirmative Action Program (TAAP) is focused on reducing inequalities faced by socially backward groups (Ref. Sr. No. iii of Schedule VII of The Companies Act, 2013)*

Trent’s CSR activities

All of the activities mentioned here below under the CSR Policy would flow from a long-term (3-5 year) CSR Strategy.

The Company’s CSR activities will focus on the following sectors and issues:

<table>
<thead>
<tr>
<th>Employability</th>
<th>Education</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water</td>
<td>Entrepreneurship</td>
</tr>
<tr>
<td>Environment</td>
<td>Health and Nutrition</td>
</tr>
</tbody>
</table>

In addition, we will respond to any disasters, depending upon where they occur and our own ability to respond meaningfully.

Geographies and target communities

The geographical focus of the Company’s CSR activities will be mainly in locations where we operate or have a significant presence.

We could concentrate our efforts also on villages and habitations in close proximity to our stores and offices. The specific locations will be determined at the beginning of each year.

While we will ensure that all communities benefit from our CSR activities, we would focus on those groups that are socially and economically marginalized. These would include underprivileged youth (men and women), socially and economically backward groups (covered by the Tata Affirmative Action Programme), people from low income groups and people with disability.

Implementing mechanism

We will implement our CSR activities through our in-house teams, Tata Trusts, NGOs’/ organizations set up to implement Tata Group Focus Initiatives.

Monitoring mechanism

Each of our CSR projects and programmes would have clearly defined output, outcome and process indicators which will have to be reported on at specified frequencies, which will be at least six-monthly reports.
All projects and programmes will be monitored by the Company CSR team. The monitoring process will cover both programme and financial reviews. The CSR Committee will receive quarterly progress reports of all CSR activities of the Company.

**Terms of reference of the CSR Committee**

The CSR Committee shall:

- Formulate and recommend a CSR policy to the Board, indicating the activities to be undertaken by the Company in areas or subjects specified in Schedule VII of the Companies Act, 2013
- Recommend the amount of expenditure to be incurred on the activities indicated in the policy
- Monitor the CSR policy regularly
- Oversee the Company’s conduct with regard to its corporate and societal obligations and its reputation as a responsible corporate citizen
- Oversee activities impacting the quality of life of various stakeholders

**Composition of the CSR Committee**

The members of the CSR Committee are as follows:

1. Chairperson: Mr. A Sen – Chairperson & Independent Director
2. Member: Mr. N. N. Tata – Non Independent; Non-Executive Director
3. Member: Mr. B. Bhat – Non Independent; Non-Executive Director
4. Member: Ms. S. Singh – Independent; Non-Executive Director
## Listing of Projects and Programmes:

<table>
<thead>
<tr>
<th>CSR Programs</th>
<th>CSR projects</th>
<th>Reference Sr. No. of Schedule VII</th>
<th>Implementation Modality</th>
<th>Implementation Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Employability</strong></td>
<td>Training of aspirants in retail trade</td>
<td>ii</td>
<td>DIR, TIAE</td>
<td>• • • •</td>
</tr>
<tr>
<td></td>
<td>Training of trainers in retail trade</td>
<td>ii</td>
<td>DIR, TIAE</td>
<td>• • • •</td>
</tr>
<tr>
<td><strong>Education</strong></td>
<td>Scholarships</td>
<td>ii</td>
<td>DIR, TIAE</td>
<td>• •</td>
</tr>
<tr>
<td></td>
<td>Special language classes</td>
<td>ii</td>
<td>BP, TIAE</td>
<td>• • • •</td>
</tr>
<tr>
<td></td>
<td>School/tuition fee subsidy</td>
<td>ii</td>
<td>DIR, TIAE</td>
<td>• •</td>
</tr>
<tr>
<td></td>
<td>School infrastructure improvement</td>
<td>ii</td>
<td>DIR, TIAE</td>
<td>• •</td>
</tr>
<tr>
<td><strong>Health and Nutrition</strong></td>
<td>Supporting projects on health and nutrition</td>
<td>i</td>
<td>DIR, TIAE</td>
<td>• •</td>
</tr>
<tr>
<td></td>
<td>Promoting preventive healthcare</td>
<td>i</td>
<td>DIR, TIAE</td>
<td>• • • •</td>
</tr>
<tr>
<td><strong>Entrepreneurship</strong></td>
<td>Special projects for vendor development</td>
<td>ii</td>
<td>DIR, TIAE, BP</td>
<td>• •</td>
</tr>
<tr>
<td></td>
<td>Providing opportunities to potential entrepreneurs</td>
<td>ii</td>
<td>DIR, TIAE</td>
<td>• • • •</td>
</tr>
<tr>
<td><strong>Environment</strong></td>
<td>Promotion of use of renewable energy</td>
<td>iv</td>
<td>DIR, TIAE</td>
<td>• • • •</td>
</tr>
<tr>
<td></td>
<td>Creating environmental awareness</td>
<td>iv</td>
<td>DIR, TIAE</td>
<td>• • • •</td>
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</tbody>
</table>

### Abbr. | Description
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DIR  | Direct: Tata Trent  
TIAE | Through implementation agency external: NGO’s, skill development agency, other resource agencies  
BP   | Business partners: Dealers, Vendors, Service provider