

TATA DIGITAL PRIVATE LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY

1. PREAMBLE

Tata Digital Private Limited ("Company") is a company incorporated under the Companies Act, 2013. The purpose is to document the policy and principles of the Corporate Social Responsibility ("CSR") obligations of the Company, in compliance with the requirements of Section 135 of the Companies Act, 2013 ("Act") read with Schedule VII to the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

2. APPROACH AND FOCUS AREAS

The CSR programs of the Company will be synergized by having a "One Tata" approach. While identifying the CSR projects, priority and focus shall be to the local areas and areas around which the Company operates.

The Company will be at liberty to choose its CSR programs as considered and included in the list of CSR activities in Schedule VII to the Act.

Other areas as reviewed and deemed appropriate by the Board and the CSR Committee may also be included in the list of CSR programs that the Company undertakes, from time to time.

3. GOVERNANCE MECHANISM

Implementation of the CSR programs / initiatives of the Company shall be reviewed and monitored by the duly constituted CSR Committee of the Board as per the requirements of the Act.

The CSR Committee of the Board will be responsible for the following:

- ❖ recommending to the Board a CSR policy, indicating the activities to be undertaken by the Company;
- ❖ recommending the expenditure to be incurred on the CSR activities;
- ❖ monitoring the implementation of the activities included in the CSR policy; and
- ❖ monitoring the spends on CSR activities by the Company in each financial year, in terms of the Act.

4. REVIEW OF POLICY

This CSR Policy document will be reviewed from time to time and any changes, if necessary, will be approved by the Board. This CSR Policy document will be reviewed from time to time and any changes, if necessary, will be approved by the Board.

5. EXECUTION/ IMPLEMENTATION

CSR programs of the Company shall be implemented through (i) contribution towards initiatives of the Company and/or Tata group companies and/or reputed outside agencies, or (ii) participation in the CSR projects and initiatives of the NGOs, other public charitable trusts,

government bodies, educational institutions, other corporates and industry associations and other suitable implementing organizations or (iii) donation to any registered charitable and benevolent fund, as considered desirable by the CSR Committee or (iv) a combination of any of the above.

The operational procedure will be aligned with the requirements of the Act. Proposals for new CSR activities, as and when received, shall be evaluated in terms of appropriateness and alignment with the CSR policy of the Company.

6. REPORTING

An annual CSR Report will be prepared in terms of the Act and shall be included in the Board's Report to the Members of the Company after approval by the CSR Committee and the Board of Directors.