

CORPORATE SOCIAL RESPONSIBILITY POLICY

Corporate Social Responsibility (CSR) is a process with the aim to include responsibility for the Company's actions and encourage a positive impact through its activities on the environment, consumers, employees, communities, stakeholders and society at large.

In the modern world, a good corporate citizen recognises that it has important social, environmental as well as financial responsibilities. Reaching out to underserved communities is part of business responsibility. To help ensure a sustainable quality of life, we need to balance economic prosperity and social progress. Every major business has an impact on the communities and societies in which it operates. It is a well acknowledged and accepted fact that an organization cannot focus only on economic performance, without paying attention to the society that surrounds it. It is the responsibility of the Company to become involved in the social and societal lives of the Community surrounding it.

Corporate Social Responsibility is strongly linked to the principles of Sustainability. A responsible organization should make decisions based not only on financial factors, but also on the social and environmental impact. Therefore, it is the primary responsibility of the Company to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of the Society.

Vision of the CSR Policy

To contribute to the social and economic development of the communities. Directing and assisting our effort to build a better, sustainable way of life for the betterment of the society.

Management Commitment

The Company subscribes to the values of concern and care. The Company's CSR policy has been intended to make a material, visible and lasting difference to the lives of the disadvantaged/underprivileged sections of society and a dedicated CSR budget would be set aside out of profits based on the specifications as per the required law for its various CSR initiatives. The Company believes and acts on a culture of generosity and thoughtfulness, characterised by a willingness to contribute in a way to help out build a society that helps everyone to grow and lead a better standard of living and assist the needy ones.

The Company would constantly strive to ensure strong Corporate culture which would emphasize on integrating CSR values with business objective. The Company's Corporate Social Responsibility policy confirms to the requirements of the Corporate Social Responsibility as spelt out by the Ministry of Corporate Affairs, Government of India.

Implementation process

All projects/beneficiaries would be identified in consultation with the Board of Directors. A robust implementation structure as well as monitoring process shall be laid down. All projects/programmes shall be placed before the CSR committee, specifying modalities of execution of such projects/programmes and the implementation schedules.

The Company has a CSR Committee in place, which shall recommend the guidelines for CSR activity to the Board of Directors for their approval.

The CSR Committee shall

(a) formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken as specified in Schedule VII

(b) recommend the amount of expenditure to be incurred on the activities referred to in Section (a); and

(c) monitor the Corporate Social Responsibility Policy

The areas/activities would be in line with the requirements of Companies Act, 2013, as per Schedule VII of the Act and the rules made under the act and as amended from time to time. The Company shall take all required/necessary actions to comply with Section 135 of the Companies Act, 2013 and the rules made thereafter. An indicative list of the area/activities would be as under:-

List of activities specified under schedule VII of the Companies Act, 2013, as on the date of the policy, are as under:—

(i) eradicating hunger, poverty and malnutrition, promoting 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;

(ii) 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;

(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;

(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 arts 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 Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled 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 Government;

(x) rural development projects.

(xi) slum area development.

In addition to the CSR Committee of the Company, the Company has an Internal Committee consisting of the below mentioned senior management personnel of the Company who shall be responsible to advise/recommend the CSR committee on the various plans/budget for the implementation of the CSR activity and assist the CSR Committee to execute the planned CSR activities effectively and efficiently.

The Internal Committee shall consist of

- Mr. Pradeep Madhav, Managing Director (Also a member of the CSR Committee)
- Mr. Prasanna Patankar, Deputy Managing Director
- Mr. Manish Jadhvani, Senior Vice President
- Mr. M N Suresh, Senior Vice President

Beneficiaries List:-

Good work is carried out by numerous organizations in different way and by different means. It is the duty of an individual as well as the Company to serve and payback to the society in which it operates. As a responsible citizen the Company also recognizes its duty to serve to the needy and under privileged section of the Society. However, in view of the manpower constraints with the Company, it cannot reach to such section of the society by its own. Hence, it is prudent to identify entities doing work in different fields for the different sections of the Society.

The amount to be allocated and utilized towards the CSR activities would be in line with the statutory requirements. The Company shall layout norms for allocation of amount to each beneficiary. Amount to be allocated to each such identified and approved entity/beneficiary will be initially kept at a maximum of Rs.10 Lacs, except for the Prime Minister National Relief Fund (PMRF) where the amount to be allocated can be higher, if the same is deemed necessary by the CSR Committee. However, it shall solely be at the discretion of the Company to allocate the amount to a specific entity from the approved list of beneficiaries. Mere mention of the name of the entity in the approved list of beneficiaries does not bind the Company to allocate the amount each year.

The Company shall have a list of beneficiaries on the basis of the recommendation made by the CSR Committee of the Company and subsequently approved by the Board of Directors. The list approved as on date is annexed to this policy. In addition to the annexed list, the Company may, as decided by the CSR Committee and Board of the Company, allocate amount for imparting Financial Literacy.

Monitoring, Assessment & Reporting Mechanism

The CSR Committee of the Board shall lay down a transparent monitoring mechanism for implementation of CSR projects or programs or activities undertaken by the Company. The Company shall on a periodical basis update the Committee on the various initiatives taken as well as other progress on varied CSR activities undertaken by the Company. A time frame, if deemed fit by the Committee, shall be laid down for all CSR projects/ activities for their timely completion.

Reporting of CSR Initiatives

CSR Committee of the Board will periodically consider the progress report on the various CSR initiatives taken up by the Company and shall be reported in the Company Annual Report under Directors' Report, as required under the Companies Act, 2013.

General:-

Any or all provisions of the CSR Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued by Government, from time to time.

In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to the Managing Director. In all such matters, the interpretation and decision of the Managing Director in consultation with the CSR Committee shall be final.

The Company reserves the right to modify, cancel, add, or amend any of the Rules/Paragraphs/etc. mentioned above.

List of beneficiaries

Contribution to the below beneficiary(ies) shall be up to Rs.2 Crore in any financial year

I. Prime Minister's Relief Fund (PMRF)

- The Prime Minister's National Relief Fund (PMNRF) is primarily utilized to render immediate relief to families of those affected by natural calamities like floods, cyclones and earthquakes etc. and to victims of the major accidents and riots. In addition to this, the PMNRF provides financial assistance to indigent patients for treatment of major diseases at Government/PMNRF empanelled hospitals to partially defray the expenses.

There are various other organizations/NGO's that do a whole lot of good work for the community at large. Below is the list of few such organizations/NGO's. However, contribution to them shall be up to Rs.10 Lac in any financial year

I. Cancer Patients Aid Association (CPAA)

- Cancer Patients Aid Association (CPAA) works towards the Total Management of Cancer as a disease, which includes Spreading awareness on the dangers inherent in accepted social practices such as chewing of tobacco, early marriage, multiple pregnancies, etc, which are responsible for approximately 70% of cancers in India, Initiating steps for the early detection of cancer since treatment at this stage leads to a cure in a majority of cases, provide complete assistance to cancer patients beyond that given by the medical profession, that is, taking a holistic approach, not attacking the malignancy in isolation.

II. Concern India Foundation

- Concern India Foundation provides financial and non-financial aid to several grassroots organisations. They reach out to diverse target groups that include children, special children, women, men and elderly from the marginalised sections of the society and help them lead a life of dignity.

III. Dignity Foundation

- Dignity Foundation is involved in creating an enlightened society in which senior citizens feel secure, confident and valued, and can live with dignity. The NGO is committed to changing the way people look at ageing in India. They assist and enable senior citizens to lead active lives through easy access to trusted information, opportunities for productive ageing and social support services.

IV. Indian Cancer Society

- Indian Cancer Society has been doing sterling work in fighting cancer across India. It has been and continues to be the beacon of hope for thousands of underprivileged cancer patients. Most of the patients visiting them come from all over the country and who can't even afford two meals a day. In such cases undergoing treatment is beyond their capacity. The society is entirely

dependent on public support for its various activities concerned with financing the treatment and rehabilitation of cancer patients and for spreading cancer awareness and its early detection.

V. Make a Wish Foundation of India

- The Foundation is dedicated to granting the most cherished wish of children between the ages of 3 and 18 years, living with life-threatening illnesses, irrespective of their socio-economic status, caste, race or religion.

VI. Nanhi Kali

- The purpose of Nanhi Kali is to provide primary education to underprivileged girl children in India. Nanhi Kali has been founded with a strong belief that educated women would not only contribute to the economy but also issues of population and social evils would reduce as more women are educated.

VII. Oxfam India

- Oxfam India is part of a global movement of dedicated people working hard to fight poverty and injustice. Oxfam India works to address root causes of absolute poverty and inequality. Persistent poverty and inequality is not just a violation of basic human rights of the people but it also undermines economic growth of a nation by wasting talents and human resources. It leads to a skewed society where power and decision-making remains in the hands of the few leading to greater conflicts and undermining of social cohesion in the end. Oxfam seeks to address this through a Rights Based Approach where people are seen as the bearers of civil, political and social and economic rights.

VIII. Ali Yavar Jung national Institute for the Hearing handicapped

- Ali Yavar Jung National Institute for the Hearing Handicapped (AYJNIHH) is an autonomous organisation under the Ministry of Social Justice and Empowerment, Government of India, to provide total rehabilitation to persons with sensory (hearing and vision), physical and mental disabilities.

IX. The Hellen Institute for Deaf and Deafblind

- The NGO is established with the purpose to provide a Quality of Life to every deaf and Deafblind child by providing Free/subsidized education, transport, nutrition, hearing aids, and medical facilities, uniform, Counseling services for children, teachers and parents, Pre-vocational training and every effort to rehabilitate him / her in the society, Free / subsidized residential facilities for Deafblind children residing outside Mumbai.

X. National Association for the Blind

- The NGO works to empower visually challenged population of our country, enabling them to lead a life of dignity and productivity and assure accessibility to the world of information.

XI. Goonj

- The objective of the NGO is to spread awareness about their concept of making clothing a matter of concern as a basic need, at a level so that anytime an urban household thinks of disposing off reusable material it should have a channel to reach it to the most needy. The NGO

works to re-positioning cloth and other underutilized material, beyond charity, adding dignity and turning it into a big resource for development. Spreading the idea beyond geographical boundaries so that world over people think of clothing as a basic need and a subject to work on.

XII. The Nalanda Foundation

- The Nalanda Foundation was established by Infrastructure Leasing & Financial Services (IL& FS) in 1998 in Mumbai, to assist children with Learning Difficulties by providing an effective educational infrastructure, including related support services.

XIII. Udaan India Foundation

- Udaan India Foundation is an NGO that works towards the cause of educating underprivileged children. It conducts various activities to enable a brighter future for children from low-income communities by providing them with the desired knowledge, skills, values and support to achieve their true potential. Through a holistic approach to education, it works to integrate academic achievement with non-academic learning by providing knowledge, skills and values that prepare children for a future full of opportunities.

XIV. HelpAge India

- HelpAge India has been working for disadvantaged elderly for more than 3 decades. Its focus is to improve the quality of life of destitute elders primarily in the rural areas through its welfare projects by providing free rations, free medicines and consultations and conduct free cataract surgeries. Also it works in educating the elderly for their rights, engaging with the government on framing of new legislation and pushing for the implementation of the National Policy of Older Persons. It also focuses on the concerns of urban elderly who face emotional and physical problems.

XV. Chasma

The Company would not use corporate funds for political contributions to any party or candidate or in support of any ballot measure or political committee.