

Corporate Social Responsibility Policy (CSR)

Approved by Board on July 8, 2021
[Version 3.0]

I. Preamble

The purpose of Corporate Social Responsibility of Societe Generale Global Solution Centre Private Limited (Company) is to contribute to the Company's strategy by promoting and nurturing its values: Commitment, Responsibility, Team spirit and Innovation.

In line with provisions of Indian Companies Act and the Group's Corporate citizenship support instruction, the company has defined a Corporate Social Responsibility Policy document to implement the CSR activities.

II. Objectives

The main objective of Societe Generale Global Solution Center (SG GSC) CSR program is to make a sustained positive difference in the society through high impact programs.

The objective of CSR Program is

'To encourage the creation of talent and future leaders by using sport to promote education of children, women and youth from economically deprived backgrounds and also ensuring environmental sustainability'.

III. Focus areas:

In accordance with the requirement of companies Act and Schedule VII, Company's CSR activities amongst others will focus on:

Promotion of Education: To promote education including special education especially among children, youth and women from economically deprived backgrounds.

Women Empowerment: Empowering women and girls from economically weaker sections by providing them with employment enhancing vocation skills and training.

Environmental Sustainability: To promote environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water through various initiatives.

Promoting Sports: To promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports

The details on the CSR initiatives is Annexed to this Policy.

The CSR Committee may undertake any other projects or initiatives as laid down in Schedule VII of the Companies Act.

IV. CSR Governance Structure

a. Board of Directors: The Board of Directors will be responsible for

- To approve the policy and annual action plan of the Company after taking into account the recommendation of CSR Committee and disclose contents of such policy in its report and placing the policy on the Company's website in such manner as prescribed in the Act
- To ensure the projects included in the Policy are undertaken by the Company
- To ensure that the Company spends, in every financial year, at least 2% of the average net profits of the Company made during the three immediately preceding financial years in pursuance of the Policy.

b. CSR Committee

The Corporate Social Responsibility Committee (CSR Committee) is duly constituted as per the requirements of Companies Act 2013.

The CSR Committee consists of following directors:

- Sunil Shah – Director
- Ranjeet Santhakumar – Director

The terms of reference of CSR Committee will be decided and approved by the Board of Directors of the Company.

Responsibilities: The Committee is responsible for

- To formulate CSR Policy and Annual Action Plan and recommend the same to the Board of Directors (Board) of the Company for approval.
- To Recommend CSR activities as stated under Schedule VII of the Act of the Companies Act 2013.
- To Recommend the amount of expenditure to the Board.
- To monitor Corporate Social Responsibility Policy and Annual Action Plan of the Company from time to time.

c. Communication/ Corporate Citizenship Team

The Corporate Citizenship Team (COMM/CIT) is responsible for execution, monitoring and reporting of CSR projects as approved by CSR Committee. The terms of reference of the Corporate citizenship team will be part of CSR standard operating procedure & strategy of the Company.

Responsibilities: The Corporate Citizenship team will responsible for

- Planning the annual Budgets and making the project proposals to CSR Committee
- The Ground assessment of projects and Coordination with implementing partners
- The effective execution and Implementation schedule for the projects
- Monitor the CSR projects approved by CSR Committee
- Documents and reporting of all CSR activities/ projects.
- Ensuring group instruction on CSR Committee

The CSR committee shall evaluate the effectiveness of Corporate Citizenship team from time to time

V. Guiding principles for formulation of Annual Action Plan

- a. In pursuance of this CSR Policy, the CSR Committee of the Company shall formulate and recommend to the Board an annual action plan containing the following items
- The list of CSR projects or programmes that are approved to be undertaken by the Company
 - The manner of execution of such projects or programmes.
 - The modalities of utilisation of funds and implementation schedules for the approved projects or programmes;
 - Monitoring and reporting mechanism for the approved projects or programmes;
 - Details of need and impact assessment, if applicable for the projects undertaken by the company
- b. The Company shall follow the following guiding principles for selection, implementation and monitoring of CSR Activities as well as formulation of the Annual Action Plan:
- The Company shall undertake such CSR Activities, either identified as Focus Areas under this Policy or as permitted under the Applicable Laws
 - The Company shall ensure utmost transparency in selection, implementation, monitoring and reporting of CSR Activities as per the CSR policy.
 - The Company shall identify the needs and priorities of the society and shall give preference to local areas and implement the relevant programs.
 - The Board may alter the Annual Action plan at any time during the financial year, based on the reasonable justification and/or on recommendation of CSR committee

VI. Mode of Implementation

The mode of implementation of CSR activities/ programmes will include combination of direct implementation and implementation through NGOs, Trust, Registered Societies etc.

Societe Generale GSC shall implement its Citizenship Commitment programmes and projects:

- **Internally:** Through its CSR Committee and the Corporate Citizenship team, which will collectively formulate criteria and procedure for selection, screening and due diligence of its implementing partners, and eventually approve the supported projects or NGOs
- **Externally:** Through a public charitable trust or a society registered under applicable Act or a Company registered under Section 8 of the Companies Act 2013. The implementing partners shall have track record of atleast three years in implementing projects in the respective areas.

The Company may collaborate or pool resources with group companies, other organizations to undertake CSR activities.

VII. Selection, Execution and Monitoring

The Corporate Citizenship team (COMM/CIT) shall formulate criteria and procedure for planning, selection, screening and due diligence of its implementing partner. The team will receive suggestions

for short listing of NGOs for funding of projects from any member of Board Committee/ its operation committee. NGOs who approach the committee proactively can also be considered by the team. The team will evaluate proposal and forward its recommendation to CSR Committee. The CSR Committee will discuss and approve the proposals.

The team will work with the implementing partners to monitor the effective execution of each project by field visit, receipt of quarterly reports and certified statement of expenditure.

VIII. CSR Budgeting, Resource allocation and Disbursement

The Company shall ensure to spend at least 2% of average net profit (before tax), made during the three immediately preceding financial years for CSR Activities every year. This is made available to the CSR committee for funding of the approved projects annually.

CSR expenditure shall include all expenditure including contribution to corpus for projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on any item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Act

The Expenditure on capacity building of their own or of implementing organization including administrative overhead shall not exceed five percent of total CSR expenditure in a financial year.

The surplus arising out of the CSR activities, projects or programs shall not form part of the business profit of the Company.

In case the company fails to spend the allocated CSR amount, the Board of Directors shall specify in its report the reasons for not spending the allocated amount.

IX. Reporting and Documentation

The Corporate Citizenship team will collate and maintain MIS data and other such information related to CSR projects. The corporate citizenship team will report to CSR committee on the progress and status of expenditure on CSR projects on half yearly basis.

The Committee shall annually prepare CSR report as per the format provided in the Companies Act and submit the same for the approval of the Board and then for publication.

X. Publication of CSR Policy & Programs

As per the CSR Rules, the contents of the CSR Policy along with composition of the CSR committee and projects approved by the Board shall be displayed on the Company's website.

XI. Review and Revision of the Policy

The committee will review its CSR policy from time to time and make suitable additions/ deletions as may be required and submit the same for approval of Board.

Annexure

Focus Areas	Initiatives
Education	<ul style="list-style-type: none"> • Childhood to livelihood • Infrastructure and Technology – Supporting Education • Scholarship for needy and meritorious students • Model school programs • Education for Children, Women and disabled • Education through sports- Sports for development • Youth Entrepreneurial Development program
Women Empowerment	<ul style="list-style-type: none"> • Skill development and vocational training program • Micro Entrepreneurship program • Rural Women – Led Enterprises
Environment	<ul style="list-style-type: none"> • Energy efficiency and conservation programs • Reviving of water bodies and access to clean drinking water • Green Initiatives • Waste Management