



CORPORATE SOCIAL RESPONSIBILITY POLICY

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INTRODUCTION

The SIS Group comprising Security and Intelligence Services (India) Limited and its subsidiaries and joint ventures (“SIS”), has been at the forefront of bringing social change in the lives of thousands of people in India. It employs over 80,000 people in India, of which a large majority come from the less privileged sections of society with limited means for education, development and livelihood. SIS has been instrumental in improving lives of these people through training, development and providing them employment opportunities.

Corporate Social Responsibility (CSR) has been an integral part of the way that the SIS group does its business since inception. The SIS Group set up the SEWA trust for the betterment of lives of the employees. The Group has engaged in various activities in the communities that our employees live in, which has benefited thousands of people over the years. The company has also been at the forefront in imparting and encouraging skills based training to people from backward and less developed communities across the country.

OBJECTIVE

- a. This Corporate Social Responsibility (CSR) Policy of the Company has been formalized based on the vision on the vision and principles of the SIS Group. The main objective of this CSR Policy is to lay down guidelines to make CSR a key business process for sustainable and beneficial engagement with the society and the environment in which the Group operates. It aims at enhancing welfare measures of the society based on the immediate and long term social and environment consequences of the Group’s activities. This Policy specifies the projects and programmes that can be undertaken, directly or indirectly, the modalities of execution and the monitoring thereof.
- b. The scope of the Policy has been kept as wide as possible, so as to allow the SIS Group to respond to changing and immediate societal needs and maintain flexibility, but at the same time focus on a specific set of activities that bring long term benefit to society.

MODE OF CONTRIBUTION

- c. SIS may directly engage in activities as listed in Section 4 of this policy.

- d. SIS may contribute to the activities, projects or programs, relating to activities as listed in Section 4 of this policy, through contributions to trusts, societies, NGOs, or institutions, performing such activities.
- e. The following activity shall not form part of the CSR activities of the Company:-
 - i. The activities undertaken in pursuance of normal course of business of a company
 - ii. CSR projects/programs or activities that benefit only the employees of the Company and their families.
 - iii. Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes.
 - iv. Any CSR projects/programs or activities undertaken outside India.
- f. Any surplus that may arise out of the projects/programmes will not form a part of the business profit of the company and would be ploughed back into the CSR activities of SIS.

CSR ACTIVITIES

- g. Under Schedule VII to the Companies Act, 2013 (as modified vide notification dated 27th February, 2014), activities relating to the following may be included by companies in the CSR Policies.
- h. eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- i. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- j. 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;
- k. 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;
- l. 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 and handicrafts;
- m. measures for the benefit of armed forces veterans, war widows and their dependents;
- n. training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;

- o. 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;
- p. contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government
- q. Rural development projects.

The CSR activities of SIS will focus on projects and activities in the focus areas as stated in Section 5 of this policy but not necessarily in that order of priority and may also include and extend to other specific projects/ programs as permitted under the law from time to time.

FOCUS AREAS

r. Education

- i. Promoting education to children including primary, secondary and university education
- ii. Building schools, colleges and training institutions including provision for full time residential institutions and full student sponsorship
- iii. Promoting and sponsoring girl education at all levels
- iv. Women education and self-employment training
- v. Other educational projects

s. Vocational Training / Education and Livelihood Enhancement

- i. Vocational training in security, cleaning, gardening, plumbing, electricals, and other specialities/vocations
- ii. Government Programs under the skill development sector
- iii. Computer literacy training
- iv. Building training schools and facilities for vocational skills
- v. Local community camps for skill developments in various specialities
- vi. Other vocational training initiatives

t. Sanitation and drinking water

- i. Drinking water projects for local communities
- ii. Domestic bathroom and sanitation for rural and urban households
- iii. Community bathroom and sanitation in urban and rural areas
- iv. Women sanitation projects
- v. Other water conservation and sanitation programs

u. Health

- i. Local community health check camps
- ii. Building hospitals, clinics, diagnostic centres and associated infrastructure
- iii. Blood donation camps and other specific ailment camps
- iv. Other programs towards betterment of health and nutrition

v. Others

- i. Promoting local artisans, craftsmen and protecting traditional arts
- ii. Promotion of sports in athletics, swimming, archery, shooting,
- iii. Protection of national heritage
- iv. Programs for the benefit of the benefit of armed forces veterans and their dependents
- v. Planting of trees and protection of indigenous flora and fauna

EMPLOYEE INVOLVEMENT

One of the internal objectives of the CSR Policy is to seek an active participation of employees of the Company at all the locations. Employees will be encouraged to volunteer their time and effort in respect of SIS sponsored programme or on their initiatives. The Company will recognize the efforts put in by employees in CSR activities. A widespread awareness of the CSR initiatives of SIS will be conducted and the Group seeks and active and wide participation from employees and encourages any suggestions and project ideas from them.

MONITORING PROCESS

- w. A CSR Committee has been formed as per the applicable laws and the committee shall be responsible for the implementation/monitoring and review of this policy and various projects/activities undertaken under the policy. The CSR Committee shall submit periodical reports to the board of directors. The members of the CSR committee are:
 - i. Mr. Ravindra Kishore Sinha, Chairman-cum-Managing Director, SIS Group
 - ii. Dr. Ajoy Kumar
 - iii. Mr. Devdas Apte
- x. The committee shall endeavour to spend atleast 2% of the average net profit during the preceding 3 financial years on CSR activities as enumerated above. The CSR committee

- shall evaluate and decide the amount that is to be allocated to each specific project/ activity.
- y. The Committee Members will receive in a prescribed format, a quarterly report of CSR spend
 - z. A presentation on the progress of the CSR projects / activities will be made to the Committee by the CSR Executives at the Committee meetings held from time to time
 - aa. An annual presentation will be made to the Committee which will also includes the details of the projects / activities planned for the next year and its respective budgets.
 - bb. The CSR Committee may also:
 - i. Seek monitoring and implementation report from the organisations receiving funds.
 - ii. Seek periodic field visits by the persons deputed by the company;
 - iii. Delegate a designated company official to monitor the CSR activities undertaken and ensure information in a timely manner.
 - cc. Additionally, the CSR Committee may empower the CEO to spend such amount as they think appropriate for some special CSR projects or requirements that may arise during any financial year. The amount spent as above shall be put up for ratification of the Committee at its next meeting and shall be reported to the Board accordingly.

DISSEMINATION OF INFORMATION

- dd. The CSR Committee will report to the Board, at least once a year on the status of the CSR projects/ activities undertaken by the Company and review the policy on a periodic basis.
- ee. The Company would upload this Policy on its website www.sisindia.com. Further, a detailed status report on the CSR activities carried out by the Company would be disclosed every year as part of the Directors' Report in the Annual Report. The said information would also be uploaded on the website of the Company.

MANAGEMENT COMMITMENT

Our Board of Directors, our Management and all of our employees subscribe to the philosophy of compassionate care. We believe that a business has to give back to society and to the environment and community in which they operate such that it helps in building a secure, healthy, knowledgeable, and sustainable society and business.