SIS LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

SIS Group Enterprises
A Market Leader in Security, Cash Logistics & Facility Management

Contents

1. INTRODUCTION 3
2. OBJECTIVE 3
3. MODE OF CONTRIBUTION 3
4. CSR ACTIVITIES 4
5. FOCUS AREAS 6
A. EDUCATION 6
B. VOCATIONAL TRAINING / EDUCATION AND LIVELIHOOD ENHANCEMENT 6
C. SANITATION AND DRINKING WATER 6
D. HEALTH 7
E. OTHERS 7
6. EMPLOYEE INVOLVEMENT 7
7. MONITORING PROCESS 7
8. DISSEMINATION OF INFORMATION 8
9. MANAGEMENT COMMITMENT 8
10. REVIEW 8

1. INTRODUCTION

The SIS Group comprising SIS 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 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 the 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 the 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.

2. OBJECTIVE

a. This Corporate Social Responsibility (CSR) Policy of the Company has been formalized based 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 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.

3. MODE OF CONTRIBUTION

a SIS may directly engage in activities as listed in Clause 4 of this policy.

b SIS may contribute to the activities, projects or programs, relating to activities as listed in Clause 4 of this policy, through:

i. company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company; or

ii. a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or

iii. any entity established under an Act of Parliament or a State legislature; or

iv. a company established under section 8 of the Act, or a registered public trust or a registered society, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under section 12A and approved under 80 G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

Explanation: *For the purpose of clause (c), the term "entity" shall mean a statutory body constituted under an Act of Parliament or State legislature to undertake activities covered in Schedule VII of the Act.*

c 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 as defined in clause (k) of section 2 of the Code on Wages, 2019 .

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 except for training of Indian sports personnel representing any State or Union territory at national level or India at international level.

v. activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services.

vi. activities carried out for fulfilment of any other statutory obligations under any law in force in India.

d Any surplus that may arise out of the projects/programmes will not form part of the business profit of the company and would be ploughed back into the CSR activities of SIS.

4. CSR ACTIVITIES

Under Schedule VII to the Act, activities relating to the following may be included by companies in the CSR Policies.

a. eradicating hunger, poverty and malnutrition, promoting health care including 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;

b. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;

c. 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;

d. 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 setup by the Central Government for rejuvenation of river Ganga;

e. 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;

f. measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;

g. training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;

h. contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES 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;

i. Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government;

j. Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR)

and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);

k. Rural development projects;

l. Slum area development

Explanation: *Slum Area mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.*

m. Disaster management, including relief, rehabilitation, and reconstruction activities.

The CSR activities of SIS will focus on projects and activities in the focus areas as stated in Clause 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.

5. FOCUS AREAS

a 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 girls education at all levels;

iv. Women education and self-employment training;

v. Other educational projects.

b Vocational Training/ Education and Livelihood Enhancement

i. Vocational training in security, cleaning, gardening, plumbing, electricals, and other specialties/ 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 specialties

vi. Other vocational training initiatives

c 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

d 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

e 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

6. EMPLOYEE INVOLVEMENT

One of the internal objectives of the CSR Policy is to seek active participation of employees of the Company at all 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.

7. MONITORING PROCESS

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.

b. 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.

c. At the commencement of each financial year, Board shall approve the budgeted amount required to be spent in the financial year.

d. Activities to be undertaken in areas or subjects specified in Schedule VII of the Act will be placed before the Board.

e. Board to further authorise CSR committee and Managing Director to decide on specific projects, manner of execution of such projects and modalities of utilization of funds and implementation schedules for the projects.

f. Details of the projects undertaken during the previous year will be reported to the Board in the first meeting of next year.

g. The CSR Committee may also:

   i. Seek monitoring and implementation report from the organisation receiving funds.

   ii. Seek periodic field visit reports 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.

8. DISSEMINATION OF INFORMATION

a. 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.

b. The Company would upload this Policy, composition of the committee and projects approved by the Board on its website www.sisindia.com.

c. 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.

9. 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.

10. REVIEW

The Board, based on the recommendations of the CSR Committee of the Company, may, subject to compliance with applicable law, modify the CSR Policy at any time as deemed necessary to fulfil the Company's statutory obligation to undertake CSR activities. Further, in case of any subsequent changes in the provisions of the Act or any other regulation which

makes any of the provisions in the policy inconsistent with the Act or regulations, the provisions of the Act or regulations would prevail over the policy.