

CORPORATE SOCIAL RESPONSIBILITY (CSR)
POLICY OF
SIGNATUREGLOBAL (INDIA) PRIVATE LIMITED

Contents

1. Introduction	03
2. Approach of CSR	03
3. Scope	03
4. Policy	04
5. Budgets	05
6. CSR Committee	05
7. Mode of Implementation	06
8. Areas of CSR Projects / Programmes / Activities	06
9. Board Responsibility	06
10. Review/Amendment	07
11. Disclosure / Reporting	07

1. INTRODUCTION

Signatureglobal (India) Private Limited (“the Company”) was incorporated under the provision of the Companies Act, 1956 on 28th March, 2000. Signatureglobal (India) Private Limited CSR Policy believes in integrating its business values and operations to meet the expectations of its stakeholders and the society at large. The Company believes that long-term sustainability can be achieved by meeting legitimate concerns of all stakeholders. The Company’s approach to sustainable development focuses on the triple bottom line of Economic, Environmental and Social performance. As a responsible corporate citizen, the Company is constantly engaged in delivering value to its stakeholders through its promise of *Together Safer, Everywhere*.

This Policy shall be called “Corporate Social Responsibility Policy” or “CSR Policy”, which is framed in accordance with the provisions of Section 135 of the Companies Act, 2013 (“the Act”) read with Companies (Corporate Social Responsibility Policy) Rules, 2014 (“CSR Rules”).

This Policy outlines the Company’s philosophy and responsibility and lays down the guidelines and mechanism for undertaking socially useful programmes towards welfare & sustainable development of the community around the area of operations of the Company and other parts of the Country.

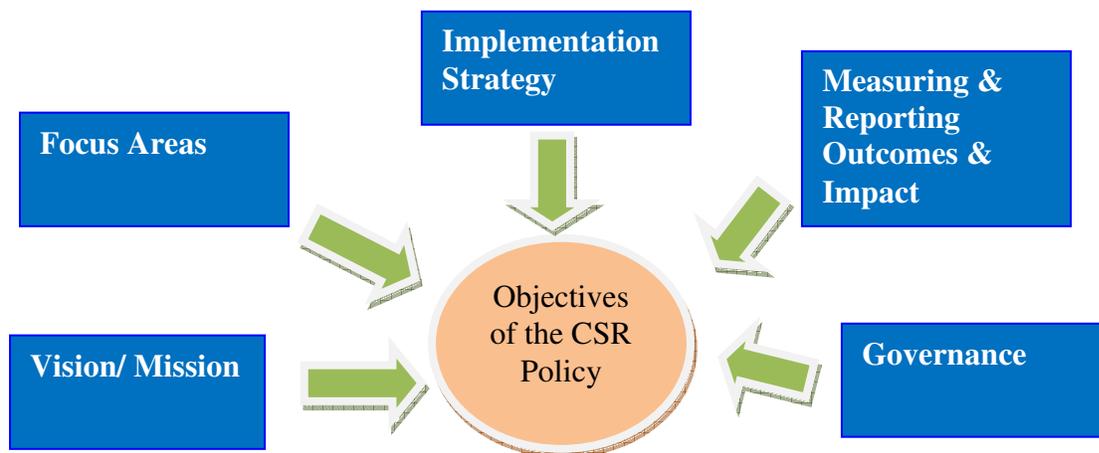
2. APPROACH OF CSR

The Company may evolve to follow self-substantive model to empower communities and believes that for sustainable social intervention, participation of communities must be ensured in the Company’s CSR projects/programmes by working in close collaboration with local, national development agencies/organizations.

3. SCOPE

This policy is applicable to Signatureglobal (India) Private Limited. The following are the key elements of the policy:

- 3.1 Vision and framework of Corporate Social Responsibility and its approach towards the same.
- 3.2 Key focus areas of inclusive development
- 3.3 Overview of the implementation strategy of various CSR initiatives
- 3.4 Methodology of measuring and reporting outcomes and impact
- 3.5 Governance Structure



4. POLICY

4.1 Corporate Social Responsibility Philosophy

“Be the Change
that you want to
see in the
world”

4.1.1 Conscious business decisions by the company have directly and indirectly created value for multiple stakeholders and helped in improving lives of the people. Signatureglobal (India) Private Limited has always believed in creating societal value by providing affordable products and services which have assisted in the growth of relevant industries. Across all its areas of operations, there are inherent linkages and interconnections with the immediate and long term societal impact.

4.2 Focus Areas of Engagement

The following are the focus areas:

- ✓ Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;

- ✓ Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- ✓ 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;
- ✓ Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, 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].
- ✓ 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;
- ✓ Measures for the benefit of armed forces veterans, war widows and their dependents;
- ✓ Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- ✓ Contribution to the Prime Minister 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;
- ✓ Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- ✓ Rural development projects.
- ✓ Slum Area Development
- ✓ Area as per the conditions laid down on the Company by various Departments statutory/ Judicial/ Quasi Judicial/ Civil / Local Authorities from time to time.

5. BUDGETS

- a) The Board of Signatureglobal (India) Private Limited shall Endeavour that minimum 2% of average net profit of the Company for immediately preceding three financial years (“**CSR Expenditure**”) is spent on CSR initiatives undertaken by company.
- b) All expenditure towards the programs to be diligently documented

7. CSR COMMITTEE-CONSTITUTION AND ROLE

➤ **Constitution of CSR Committee:**

The Board of Directors of the Company in compliance with the provisions of the Act and Rules, constituted a Board level CSR Committee to oversee the governance and implementation of the CSR Policy.

The CSR Committee shall meet at least once in a year or at such other intervals as it may deem fit to review the implementation status of the Company's CSR initiatives.

8. MODE OF IMPLEMENTATION

The CSR projects/programmes will be executed through CSR Committee under the supervision of CSR Committee.

The CSR Committee may identify location wise projects and appoint any registered trust or Section 8 Company or society as Agency to implement the various CSR projects or CSR programs. The Company shall provide funds to CSR Committee/ Agency appointed by CSR Committee on requirement basis. The funds will be utilized by Agency/ this committee for such projects or programmes as may be approved by CSR committee. The Board with support of the CSR Committee will maintain records for each project at each location and ensure to provide the details of expenditure / reports for each project undertaken under this CSR Policy, in a manner as may be desired by the Company, from time to time.

The allocated CSR budget / corpus will be utilized for CSR activities to be undertaken within India:

- (i) which shall not be exclusively for the benefit of employees of the Company or their family members.
- (ii) Which are not in pursuance of normal course of business of the Company.

The Board of Directors (“the Board”) has delegated necessary powers and authorities to the CSR Committee for execution and implementation of the CSR Policy of the Company. The CSR Committee shall always adhere to the duties including but not limited to the following –

- a) Formulate, recommend and time to time update to the Board a CSR Policy.
- b) Recommend the amount of expenditure to be incurred on the activities under this CSR Policy.
- c) Monitor the CSR Policy of the Company from time to time.
- d) To perform such associated activities as may be delegated by the Board.

9. AREAS OF CSR PROJECTS / PROGRAMMES / ACTIVITIES

The CSR activities will be carried out in India and preferably around the areas of the Company’s operational locations / offices in India.

However, the CSR Committee may identify other areas for CSR activities, from time to time.

10. BOARD RESPONSIBILITY

The Board shall ensure that:

Pursuant to the provisions of the Companies Act, 2013, the Board shall be responsible for -

- Undertaking CSR activities, as per clause 4 of this Policy, are undertaken by the Company;

- Ensuring that the Company spends, in every financial year, at least two percent of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of this Policy.
- Ensuring the reasons for not spending the above amount are explained in the Board's Report, if the Company fails to spend such amount.

12. REVIEW/AMENDMENT

The Board may amend, abrogate, modify or revise any or all clauses of this Policy, on recommendation of the CSR Committee and in accordance with the Act.

13. DISCLOSURE / REPORTING

The Board Report shall include an annual reporting on CSR activity in the format prescribed under the Rules. The CSR Policy will be placed on the Company's website, if any, and the update on projects/activities will be shared.
