

# **Corporate Social Responsibility Policy Geometric Limited**

1/24/2015

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## **1. PREAMBLE:**

At Geometric Limited (GL), we are committed to the UDAAN vision of giving back to the society and help inclusive growth of deprived community. Our strategic Corporate Social Responsibility (CSR) projects are aimed at achieving UDAAN goals and have helped us build a reputation of being one of the most socially and environmentally responsible companies in India.

## **2. PURPOSE:**

The key purpose of this policy is to:

- Achieve positive, sustainable change in the community.
- Utilize company assets (available skill sets and infrastructure) for the benefit of the underprivileged community.
- Encourage voluntary efforts by employees and their families.

## **3. POLICY STATEMENT:**

The policy focuses on addressing basic social, economic, environmental and economic needs of the marginalized/underprivileged sections of the society. We adopt an approach that integrates the solutions to these problems into the strategy of the company, to benefit the communities at large and deliver social and environmental impact.

## **4. GOVERNANCE STRUCTURE:**

We have constituted a robust and transparent governance structure to oversee the implementation of our CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013.

### **4.1 CSR Committee**

The CSR governance structure of GL will be headed by the CSR committee.

#### **4.1.1 CSR Committee Members**

This committee will report to the Board of the Company, and will comprise of:

- Mr. Milind Sarwate, Independent Director
- Mr. Ajay Mehra, Independent Director
- Mr. Manu Parpia, Managing Director & CEO

#### **4.1.2 Responsibilities**

- Formulate and recommend to the Board a CSR Policy and activities to be undertaken
- Recommend the amount of expenditure to be incurred on the activities
- Monitor the CSR Policy from time to time

### **4.2 Management Committee**

The Management Committee is responsible for ensuring the smooth execution of all the CSR projects within the company. The committee will report to the CSR Committee and will comprise of:

- Ms. Anwesa Sen Global Head - Human Resources
- Ms. Rinku Basu Global Head - PSG
- Ms. Sunipa Ghosh Company Secretary & Compliance Officer
- Ms. Bindu MB Deputy Manager - HR-Process Management
- Ms. Simran Singh Software Engineer (Mumbai )
- Mr. Shujauddin Ranwala Senior Software Engineer (Pune )
- Mr. Mithun K Kurian Lead Design Engineer (Bangalore)
- Ms. Johanna Kirthi M Management Associate – HR (Chennai)

#### **4.2.1 Responsibilities**

- Responsible for the execution of the decisions taken by the CSR Committee;
- Ensure on-ground implementation of projects;
- Send periodic reports to the CSR Committee; and
- Meet every quarter to review the progress.

### **5. SCOPE OF CSR ACTIVITIES:**

CSR activities shall exclude activities undertaken in pursuance of normal course of business. This policy applies to all our CSR projects. On a periodic basis this policy will be reviewed and updated in line with relevant codes of corporate governance, international standards and best practices.

The CSR activities may be undertaken by a registered trust or a registered society or a company established under Section 8 of the Companies Act, 2013 with such entities having a track record of at least 3 years in undertaking similar projects.

Furthermore, the policy also fulfills the requirements of the CSR as per the Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 and Schedule VII of the said Act, namely :-

- i. 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;
- 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, Para-olympic 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.

Explanation.— For the purposes of this item, the term ‘slum area’ shall 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.”

### 5.1 Normal Course of Business

GL is a specialist in the domain of engineering solutions, services and technologies. Its portfolio of Global Engineering services, Product Lifecycle Management (PLM) solutions, Embedded System solutions, and Digital Technology solutions enables companies to formulate, implement, and execute global engineering and manufacturing strategies aimed at achieving greater efficiencies in the product realization lifecycle.

## 6. GOALS OF UDAAN:

- i. Achieve positive, sustainable change in the community;
- ii. Utilize company assets (available skill set and infrastructure) for the betterment of the community;
- iii. Involve voluntary efforts by employees and their families; and
- iv. Education & Welfare and beneficiary group as “Underprivileged Children and Youth” with activities as under:
  - Support classes for school children
  - Financial support for Education and Child Welfare
  - Books, Clothes and Toys collection for children
  - Arranging Eco trips for children
  - Career guidance for underprivileged youth
  - Fund raising during natural calamities & otherwise
  - Festival celebrations at orphanages
  - Several One-Time Activities like Blood Donation Camps, Art Exhibitions, etc.

## 7. CSR EXPENDITURE:

The Companies Act, 2013 has prescribed and recommended the expenditure amount on CSR to be 2% of the average net profits of the Company, during the three immediately preceding financial years. In accordance with the regulations, if the Company is unable to make this expenditure, appropriate reasons shall be provided in the CSR Report, which would form a part of the Annual Report of the Company.

Such CSR expenditure shall include all expenditure including contribution to corpus, or on 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 an item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Act including all subsequent modifications notified.

The amount of expenditure made on activities undertaken through CSR capacities built with our own personnel in collaboration with registered entities shall not exceed 5% of the total expenditure of the Company in one financial year.

## **8. CSR BUDGET:**

The total budget for the CSR projects will be decided in conformity to the aforementioned regulatory requirements and will form a part of the Annual Operating Plans, in accordance with the GL goals and priorities identified for each of the key focus areas by the CSR Committee.

## **9. PROJECT LIFE-CYCLE:**

At GL, CSR projects are strategically planned and managed. Following are the key stages of a project:

### **9.1 Project Approval**

The projects suggested by the Management Committee in consultation with the UDAAN team and company-level programme managers will be presented for the approval of the CSR Committee.

### **9.2 Implementation**

The final projects approved by the CSR Committee will be sent to the individual Programme Managers, who in turn will break down the projects into time-bound targets and action plans. These projects will either be self-implemented, in partnership with an Implementing Agency or in collaboration with other corporates.

### **9.3 Monitoring**

The individual Programme Managers will be responsible for monitoring approved projects, by methods which may include site visits, review meetings, progress reports etc. Periodic assessments have to be done to track data and monitor projects thereby ensuring transparency and efficiency in the implementation process. Projects will be evaluated against the predefined goals and milestones, together with the Implementing Agency (if any). The reports will be submitted to the Management Committee for the quarterly/half yearly review meetings.

### **9.4 Reporting**

The CSR committee, based on reports presented by the Management Committee, will annually publish report on the CSR projects as a part of the Director's report. The report will disclose information in the format as prescribed by the Section 135 of the Companies Act, 2013.

## **10. PARTNER QUALIFICATIONS:**

If a third party is employed to carry out the implementation of our CSR projects, the Board of GL will ensure that they have a clearly explained mission/vision and an established track record of three years in undertaking similar projects or programmes. The implementation agencies should be able to produce their latest audited annual reports and in case of an NGO, they should also be able to produce their registration forms according to under Section 12A of the Income Tax Act. (Section 80G of the Income Tax Act is preferable).

## **11. TREATMENT OF SURPLUSES:**

Any surplus generated from CSR projects undertaken by us will be tracked and channelized into our CSR corpus. These funds will be further used in development of the CSR projects and will not be added to the normal business profits.

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