



CORPORATE SOCIAL RESPONSIBILITY POLICY

Corporate Social Responsibility (CSR) creates a dynamic relationship between a company on the one hand and the society and the environment on the other. Though looked upon as a voluntary activity so far, CSR is traditionally inspired by a philanthropic spirit and driven by a moral obligation towards the society.

1. SHORT TITLE AND APPLICABILITY

This policy which reflects the company's philosophy and sense of commitment as a corporate citizen and lays down the guidelines and mechanism for undertaking socially beneficial welfare programmes and sustainable development of the community is called "Skipper Limited CSR Policy". It has been prepared keeping in view the requirements of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014, notified by the Ministry of Corporate Affairs vide Notification dated February 27, 2014.

This policy shall apply to all CSR initiatives and activities taken up at various locations for the benefit of different segments of the society, specially the deprived, under-privileged and differently able persons.

2. CSR VISION STATEMENT AND OBJECTIVE

CSR is a form of self-regulation integrated into the company's business model and practices. Therefore, the Policy will function as a built-in mechanism whereby the Company will monitor and ensure its active and full compliance so as to meet the designated ethical goals and standards. The main objective of the Policy is to establish the basic principles and a general framework of action for the management to undertake and fulfill its corporate social responsibility.

3. CSR COMMITTEE

Composition :

Corporate Social Responsibility Committee shall consist of three Directors of which one shall be an Independent Director.

Meetings :

The committee shall hold meetings as and when necessary.

Role of CSR Committee

The CSR Committee shall –

- formulate and recommend to the Board a set of CSR activities and programmes to be undertaken by the company as specified in Schedule VII of the Companies Act, 2013;
- recommend the amount of expenditure to be incurred on the activities and programmes as referred to above, in a financial year;
- monitor the CSR activities of the company from time to time;
- any other matter as may be considered necessary or expedient by the Members in furtherance of or to comply with the CSR Policy of the company.

The Board of Directors shall, after taking into account the recommendations made by the CSR Committee, approve the suggested programmes and activities along with the expenditure proposed, disclose the details in their report and also publish the same on the company's website in such manner as laid down in the Companies (Corporate Social Responsibility) Rules, 2014.

The Board shall ensure that the company spends 2% of the average net profit of the company during the three preceding financial years in pursuance of the CSR Policy.

4. RESOURCES

Funding and Allocation

In order to achieve its CSR objectives through implementation of meaningful and sustainable programmes, the company will allocate 2% of the average net profit of the company during the three preceding financial years as its annual CSR budget.

The annual CSR budget shall be spent on activities and programmes laid down in the Policy and in conformity with the guidelines laid down in the Companies (Corporate Social Responsibility) Rules, 2014.

5. PLANNING AND IMPLEMENTATION

Areas

The company shall identify projects, programmes and activities which will come under any one or more of the following areas or sectors, for its CSR spending:

- (a) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh 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 Clean Ganga Fund set up by the Central Government for the promotion of sanitation;
- (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 arts and handicrafts;
- (f) Measures for the benefit of armed forces veterans, war widows and their dependents;
- (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 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) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government
- (j) Rural development projects;
- (k) Slum Area Development; and

Any other areas as may be notified by the Central Government from time to time.

Preference shall be given to local areas where the company operates for spending the funds earmarked for CSR.

The CSR projects, programmes or activities undertaken by the Company as per Company's CSR Policy shall only be counted as CSR expenditure in accordance with the provisions of sub-section(5) of section 135 of the Act.

Officers for implementation

The company shall appoint officers at its business places (units and corporate office) to undertake, supervise and monitor the CSR activities and expenditure. Such officers shall be responsible to ensure that the expenditure is made in full compliance with the Policy. They will submit periodic reports to the CSR committee.

Implementing agency

The company may decide to undertake its CSR activities directly or through Skipper Foundation or a registered trust or a registered society or a company established by the company under section 8 of the Act in compliance with the CSR Rules notified by the Central Government.

Identification of the programmes, projects or activities at the corporate and unit levels shall be done by:

- Need identification studies by the senior management/professional Institutions/agencies.
- Internal need assessment by the functional team at the local level.
- Receipt of proposals or requests from District Administration or local government etc.
- Suggestions from the Board of Directors or senior management personnel

6. EXCLUSIONS

The CSR activities shall be undertaken by the company (either new or ongoing) should not include activities undertaken in pursuance of its normal course of business.

Any contribution of any amount directly or indirectly to any political party under section 182 of the Act by the company shall not be considered as CSR activity.

The CSR projects or programmes that benefit exclusively the employees of the company or their families shall not be considered as CSR activities as per section 135 of the Act.

Any surplus arising out of CSR projects or programmes shall not form part of the business profit of the company but should be added to the CSR fund.

7. APPROVAL, MONITORING AND FEEDBACK

All CSR programmes, projects and activities should have the approval of the Board of Directors.

The Board shall set up an effective mechanism for monitoring and guiding the CSR activities on the basis of a periodic reporting system.

CSR activities of the company shall be reported in the Annual Report of the company and the Board's Report in compliance with the section 135 of the Act.

8. GENERAL

In case of any doubt with regard to any provision of the Policy and also in respect of matters not covered therein, a reference may be made to the CSR committee and in such matters the interpretation and decision of the committee shall be final.

Any or all of the provisions in the Policy will be subject to any revision or amendment in accordance with the guidelines on the subject as may be issued by the Government from time to time.

The CSR committee, subject to the final approval of the Board, reserves the right to modify, add or amend any of the provisions of this Policy.