

SEKURA INDIA MANAGEMENT LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

Title	Corporate Social Responsibility Policy
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Policy Owner	Compliance Team
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Introduction:

Sekura India Management Limited carries on the business of project management and infrastructure support services for infrastructure and infrastructure-related projects, including project supervision, budgeting, fund deployment, financing arrangements, regulatory compliance, and advisory services.

As an operating strategy, Sekura provides services based on an overall principle of “getting it Right up-front, doing it Right thereafter”. This entails:

- Assisting in due diligence exercise of new projects.
- Improving the operational efficiency of assets by ensuring implementation of technology driven predictive and proactive maintenance program by the vendors.
- Regular monitoring of assets through Sekura Control and Analytic Centre.
- Assisting in optimising the capital structure and superior financing terms for projects.
- Pursuing commercial improvements through better receivables management, etc.
- Implementation of best in class proprietary SOPs and processes for asset operations.

Short Title & Applicability:

This policy is titled as the ‘**CSR Policy**’ and it shall apply to all Corporate Social Responsibility (“CSR”) initiatives and activities taken up by the Company for the benefit of society.

CSR Philosophy and Vision Statement:

To leverage the capacity and capital to equip and enable the social sector achieve the greatest impact on the lives of the poor in India.

Scope of the Activities:

- 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 set-up 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 art 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 schedule caste, tribes, other backward classes, minorities and women.
- i. Contribution to:
 - (a) 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; and
 - (b) 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).
- j. Rural development projects.
- k. 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.

- l. Disaster management, including relief, rehabilitation and reconstruction activities.

The above list is illustrative and not exhaustive. The Board of Directors ("**Board**") are authorized to consider other CSR activities which are not included in this list.

It is clarified that all the aforesaid activities or programs shall be undertaken in India only and also that such programs and activities shall not be designed to benefit only the employees of the Company and their families.

The annual action plan for selection and implementation of the CSR projects covering one or more of the above list of activities will be formulated by the Board from time to time.

Funding and Allocation:

For achieving its CSR objectives, the Company shall allocate such amount of its average net profits as may be approved by the Directors, as its annual CSR budget in each financial year ("**Annual Budget**").

Allocation of the Annual Budget for CSR activities in any given year shall be as per the provisions of the Companies Act, 2013 and Rules made thereunder as amended from time to time. Any unspent/unutilized CSR allocation of a particular year will be carried forward to the next year, i.e. the CSR budget will be non-lapsable in nature.

It is clarified that the surplus arising out of CSR projects or activities shall not form part of the business profit of the Company and be ploughed back to the CSR project.

Implementation:

CSR programmes may be undertaken by the Company directly or other agencies including through EdelGive Foundation ("**EdelGive**"), a fellow Edelweiss Group company, as may be decided by the Board of the Company.

EdelGive is the strategic philanthropic arm of the Edelweiss Group and is registered as a charitable company under Section 25 of the Companies Act, 1956 (Section 8 of the Companies Act 2013). It has been established to drive large-scale sustainable change in the social sector.

EdelGive seeks to build a strong and high impact social sector for a better India by leveraging the capacity and capital of the 'for-profit world' to equip and enable the social sector to achieve the greatest impact on the lives of the poor.

EdelGive makes efficient investments in non-profits through grant funding. Each investment involves intensive due diligence along with efficient monitoring and evaluation processes. EdelGive works closely with select non-Governmental Organizations ("**NGOs**") to effectively tackle organizational development challenges and as such, utilizes the expertise and skills of Edelweiss Group employees to provide solutions to investee NGOs in the areas of strategic planning, financial sustainability, human resources, and technology

Monitoring:

1. The progress of CSR programmes undertaken will be reported to the Board on a periodic basis and the Board shall review the progress of activities.
2. The Company and other agencies may enter into such agreements as may be required from time to time for undertaking CSR activities.

Miscellaneous:

In case of any doubt with regard to any provision(s) of the policy, a reference can be made to Board of the Company. In all such matters, the interpretation & decision of the Board shall be final.

Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines as may be issued by government, from time to time.

The CSR Policy shall be reviewed from time to time abreast with the changing requirements.

