



**Fidelity**  
INTERNATIONAL

# **CORPORATE SOCIAL RESPONSIBILITY POLICY**



## **TITLE AND APPLICABILITY**

Fil India Business and Research Services Private Limited (“FIL India” or “the Company”) has prepared the CSR Policy (“Policy”) in alignment with its objective, principles and values, which was already present into our Group's core value system.

The Policy lays down the principles and mechanisms for undertaking various programs in accordance with the requirements provided under Section 135 of the Companies Act, 2013 read with Schedule VII of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (together referred as “Legal Provisions”) and in line with the subsequent amendments released therein by the Ministry of Corporate Affairs from time to time.

The Policy shall apply to all CSR projects, programs and activities undertaken by the Company at various locations in India for the benefit of diverse sections of the society.

## **APPROVAL OF CSR POLICY**

The Board of Directors of the Company (“Board”) has approved this Policy, formulated by the CSR Committee, after taking into account the recommendations by the CSR Committee.

The Board may amend the Policy as may be required from time to time, basis the recommendations of CSR Committee.

Any or all provisions of this Policy are subject to the applicable provisions of the Companies Act, 2013 and subsequent amendments thereof made from time to time.

## **OUR CSR MISSION**

Under the Company’s CSR mission, the Company aims to use CSR activities as a tool to engage our employees in socially responsible activities and to make a commitment and meaningful difference in our community through different participatory and need- based initiatives in the best interest of the poor and deprived sections of the society.

## **CONSTITUTION OF CSR COMMITTEE**

The Company has constituted CSR Committee (“the Committee”) comprising of following three Directors:

- Mr. Rohit Jetly as Chair
- Mr. Ameet Nayak as Member
- Ms. Alokita Jha as Member

The Board of Directors may re-constitute the Committee, as and when required to do so, by following the sections, sub-sections, rules, regulations, notifications issued or to be issued, from time to time, by the Ministry of Corporate Affairs.

The Committee shall exercise powers and perform the functions assigned to it by the Board of Directors of the Company pursuant to section 135 of the Act and CSR Rules notified with regard thereto.

## **OUR ACTIVITIES**

The Company's main focus on social causes for improving the quality of life of the people. The specific programs/activities under these focus areas will be finalised during each year and submitted for approval of the Board. The Company may take up other projects, programs or activities relating to entries as per Schedule VII of the Companies Act as it may consider appropriate from time to time, which may include but not be limited to the following areas.

- 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.
- 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, 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.
- 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.
- Measures for the benefits of armed force veterans, war widows and their families
- Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports.
- Contribution to the Prime Minister's national relief fund or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, 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 & infrastructure projects.
- Urban slum improvement & development.
- Disaster relief(s) and rehabilitation support.

Subject to the Legal Provisions, Board shall have the discretion to take a call on whether any activity falls within the entries above and in Schedule VII and its decision shall be final. Company shall give preference to the local areas and areas around it where it operates, for spending the amount earmarked for CSR activities.

Activities excluded from purview of CSR expenditure:

- Activities which are exclusively for the benefit of employees of the company or their family members.
- Activities undertaken in pursuance of normal course of business of the Company.
- Direct or indirect contribution to political parties.
- Expenditure on item/s not in conformity with Schedule VII of the Companies Act 2013, as amended.
- One-off events.
- Expenses incurred for the fulfilment of any obligations/compliance under any Act/Statute.

### **IMPLEMENTATION OF THE POLICY**

- Focus of CSR activities of the Company will be across India but needs of catchment areas near Company locations will be given preference. Beneficiary groups will include women, children, youth, elderly, and/or differently abled persons. The Company will choose to undertake need assessments as and when it deems necessary.
- The Company expects to spend through a combination of financial grants, technology, in-kind program contributions, and other activities which may include employee volunteering and expertise sharing.
- The Company may enter into partnerships with the government, business partners and communities to scale, sustain and create multiplier effect of its social and environment projects over the long term.
- The time period/ duration over which a particular project or program will be spread, will depend on its nature, extent of coverage and the intended impact of the program.
- The mode of implementation of CSR programs will include a combination of direct implementation and partnership with government institutions, training institutes, not for profit organizations, etc. The Company will select its activity partners after appropriate due diligence.
- The Company may use the services of internal teams, expert agencies, consultancy firms etc., wherever required for carrying out base line surveys, guidance on project design and implementation, due diligence of implementation partners, impact assessment surveys etc.
- The Company will encourage its employees for volunteering in community services as part of broader corporate citizenship mandate, but excluding any time monetisation of such an initiative.

### **CSR FUNDS**

- The Company has undertaken to spend at least two (02) per cent of the average net profit made during the three (03) immediately preceding financial years on specific CSR projects and programs. If the company fails to spend the amount, reasons for not spending to be specified in the Annual Report.
- The computation of average net profits will be carried out in accordance with the provisions of Section 198 of the Companies Act, 2013.
- The unutilized CSR budget from the two (02) per cent of the average net profit, if any, may be put back into CSR activities of the succeeding year as decided by the Board and CSR committee in accordance with the Companies Act, 2013, as amended.
- The Board of Directors shall make disclosures in the Annual Report as per clause (o) of sub-section (3) of section 134 including particulars specified in annexures to the CSR Rules.

- Surplus arising out of CSR project, program or activities shall not form part of the business profits of Company instead the same will be further spent for CSR purposes only.

### **CSR GOVERNANCE STRUCTURE**

CSR Committee shall be periodically review, monitor and update the Board about the CSR projects/ programs and the CSR Expenditure. The Board shall ensure that the activities as are included in this Policy are undertaken by the Company.

The CSR Committee shall –

- Formulate the CSR Policy and seek approval from the Board of Directors of the Company. Review the Policy on a yearly basis and make necessary changes from time to time, as required.
- Formulate and share the CSR action plan with budget for the year with the Board of Directors and seek approval. Implement the activities either through the Implementation Partner or directly through its own team.
- Spend the allocated amount on CSR activities once approved by the Board of Directors and create a transparent monitoring mechanism of CSR initiatives.
- Update project-wise Status and Submit periodic reports to the Board for the activities undertaken.
- Hold regular meetings and have their decisions approved/ratified by the Board from time to time.

### **MONITORING**

The Company shall institute a monitoring mechanism for its CSR programs ensure that each CSR program has:

- Targets, time lines and measurable parameters, wherever possible.
- A reporting framework that is aligned with the requirements of the Legal Provisions.
- All projects undertaken by the Company shall be monitored on a regular basis by the CSR Committee and report to the Board on progress and action plan, from time to time.

A CSR Team comprising of employees of the Company for fulfilling its CSR obligations, will be set up to ensure effective implementation and monitoring of the projects.

The CSR Team will submit periodic reports to the CSR Committee on the progress of the various projects approved by the CSR Committee and entrusted to it for implementation and monitoring.

### **COMPLIANCE REQUIREMENTS**

In compliance with the Legal Provisions, the Company discloses the contents of this Policy in its Annual Report, as may be required and also place it on the Company's website as per the particulars specified.