


Title		CORPORATE SOCIAL RESPONSIBILITY (CSR)-POLICY		
Reference No.	HRD (CSR) 613-POL1		Origin Date	08/01/2018
			Revision No.	B
Classification	Confidential	+	Effective Date	02/09/2021
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	Designation	GM - HR		Designation CEO
Department / Unit	HR/HQ		Division / Department	FSMS

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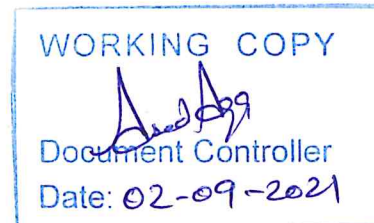
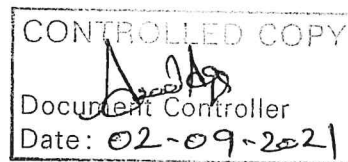
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1.0 CONTEXT



We, Faber Sindoori Management Services Private Limited (FSMS), were established in 2007, as a joint venture between Edgenta Facilities Sdn. Bhd. (earlier Faber Facilities Sdn. Bhd.) of Malaysia and Apollo Sindoori Hotels Limited of India, with a vision to be a leader in providing effective and efficient Integrated Facilities Management Services, to enhance healthcare and non-healthcare industries service standards in India. Today we are well known to be a quality Facility Management Brand. FSMS has spread all over India and is Head Quartered in Chennai.

FSMS has been a socially responsible Company since inception and has been contributing constantly for CSR activities to benefit the socially & economically disadvantaged communities. This is being done by consistently investing in various social welfare programmes across India.

The Company had a policy in line with the regulatory requirements. However, in view of the various amendments in the CSR provisions, we are amending the policy to be in line with the extant regulatory framework..

2.0 DEFINITIONS

2.1 Act- means the Companies Act, 2013 as amended from time to time

2.2 Administrative overheads” means the expenses incurred by the Company for ‘general management and administration’ of Corporate

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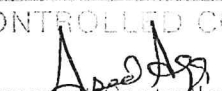
Social Responsibility functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme;

2.3 Corporate Social Responsibility (CSR)- means the activities undertaken by a Company in pursuance of its statutory obligation laid down under Companies Act, 2013

2.4 CSR Policy – means the policy approved by the Board as the Corporate Social Responsibility policy of the Company as amended from time to time.

2.5 CSR Rules or Rules – means Companies (Corporate Social Responsibility Policy) Rules 2014

2.6 Slum area - 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.

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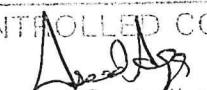
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2.7 Third parties shall mean any of the following entities

- (a) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company, or
- (b) a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
- (c) any entity established under an Act of Parliament or a State legislature; or
- (d) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities

3.0 POLICY OBJECTIVES

The objective of the CSR Policy ("Policy") is to lay down the guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan, for undertaking various programs and projects by or on behalf of the Company relating to Corporate Social Responsibility ("CSR") within the meaning of section 135 of the Companies Act, 2013 read with Schedule VII of the Act and the CSR Policy Rules-2014 ("Rules")

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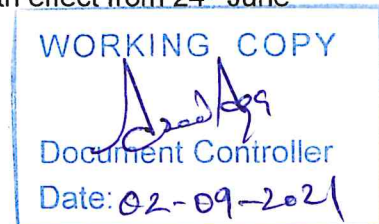
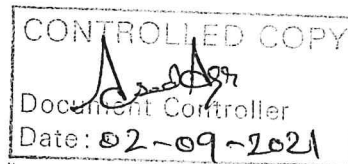
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4.0 POLICY APPLICABILITY

The policy shall be applicable to all CSR activities of the Company whether carried by it or through any implementation agency with effect from 24th June 2021

5.0 CSR COMMITTEE



Constitution of CSR Committee In terms of section 135 of the Companies Act, 2013 and the Rules made there under:

Board of Directors of the Company, at its meeting held on 04th February 2021, has constituted a CSR Committee with the following members;

Name	Designation
Ms. Sindoori Reddy	Director
Ms. Suneeta Reddy	Director
Ms. Chua Pei Sum	Director

6.0 ROLE OF THE COMMITTEE

- 6.1 Draft the CSR policy and recommend the same to the Board for approval.
- 6.2 Formulate an Annual Action plan for the year and approve the same.
- 6.3 The CSR committee shall formulate an annual action plan which shall include the following, namely:-

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(a) The list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;

(b) The manner of execution of such projects or programmes

(c) The modalities of utilisation of funds and implementation schedules for the projects or programmes;

(d) monitoring and reporting mechanism for the projects or programmes;

and recommend the same for Board approval

6.4 Recommend the amount of expenditure to be incurred on the activities referred in Schedule VII of Companies Act,2013

6.5 Review the progress of CSR projects undertaken by the Company and the utilization of budgets for each such projects

6.6 Review and recommend the CSR report to be included in the Board's report.

6.7 Review and recommend any amendments to be made in the CSR policy.

6.8 Take necessary action as per the Companies Act, for unspent amount, if any, at the end of the year.

6.9 To carry such other functions as may be delegated to it by the Board relating to CSR activities.

7.0 RESPONSIBILITIES OF BOARD REGARDING CSR SPEND

7.1 The Board shall review the recommendation of the Annual Action plan proposed by the CSR Committee and approve the same.

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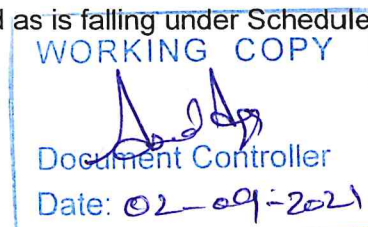
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- 7.2 Board may alter the Annual Action plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.
- 7.3 Board to ensure that the Company spends in every financial year at least two per cent. of the average net profits of the company made during the three immediately preceding financial year
- 7.4 The Board shall satisfy itself that the funds disbursed as per the Plan% of the average net profits of the Company made during the three immediately preceding financial years.
- 7.5 Board shall satisfy itself that the funds have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer shall certify to the effect.
- 7.6 The Board shall ensure that the CSR activities are undertaken by the company itself or through "Third parties"

8.0 SELECTION AND IMPLEMENTATION OF CSR ACTIVITIES

- 8.1 As part of the CSR program, the Company is presently engaged in several projects which are socially relevant and demanding in the locality surrounding its corporate office area and other locations where the Company has branches or other place of business.
- 8.2 The Company may continue to undertake / fund project, programs or activities as may be approved by the Board as is falling under Schedule VII of the Act 2013 (Annexure-I)



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9.0 MONITORING OF CSR ACTIVITIES

CSR committee of the Company will be responsible for the monitoring of various CSR expenditure incurred on projects or programs undertaken by the Company directly or indirectly vis-à-vis the budgets.

The Board shall ensure that;

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- 9.1 Company undertakes the CSR activities as provided in the CSR policy
- 9.2 The projects/ programs are implemented as per the annual action plan
- 9.3 The budget allocated for each of the project is utilized for the projects as per the approved plans.
- 9.4 The objective of the project/program is achieved as per the plans
- 9.5 Wherever projects/programs are undertaken in partnership with one or more organizations, the part of the project or program undertaken by the Company shall be distinguishable and necessary supporting documents in respect of the same shall be obtained from the Other partners/implementing agency on an annual basis.

Company shall provide necessary resources and human capital for implementation and the effective monitoring of the CSR projects and programs as may be directed by the CSR committee. The services of any external agencies or persons who have experience in the same or similar projects or programs undertaken or proposed to be undertaken by the

Company may also be made available for successful implementation and monitoring of the project.

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			Designation	CEO
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Monitoring the CSR activities will be the responsibility of HR Department. However, based on report from the HR department, Chief Financial officer needs to certify the CSR spend and provide a certificate to the Board in this regard on a quarterly basis.

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10.0 CSR SURPLUS AND EXPENSES

- 10.1** Administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year.
- 10.2** Surplus arising out of any CSR project or program or activities shall not form part of the business profit of the Company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the Company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
- 10.3** Where the Company spends an amount in excess of requirement provided section 135 of the Act, such excess amount may be set off against the requirement to spend to immediate succeeding three financial years subject to the conditions that –

- (i) excess amount available for set off shall not include the surplus arising out of the CSR activities, if any,

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(ii) Board of the Company shall pass a resolution to that effect.

11.0 AMENDMENT OF POLICY

The CSR policy of the Company may be amended at any time by the Board of the Company on the recommendation of the CSR committee.

12.0 REPORTING


On approval of the CSR policy or any amendments thereof, the contents of the policy shall be included in the Boards' report and the same shall be displayed on the web site of the Company.

At the end of each financial year, the CSR committee shall prepare a report of the CSR program in the prescribed form relating to the financial year and submit to the Board for its inclusion in the Board's report.


13.0 RESPONSIBLE TEAM

Human Resource Team shall be responsible for reporting all CSR activities at various units of the Company PAN India by 01st week of every month.

CFO to ensure adherence with Technical Guide on Accounting for expenditure on Corporate Social Responsibility Activities read with Technical guide on Accounting of CSR funds by Third parties by the Institute of Chartered Accountants of India before providing the certificate to the Board.

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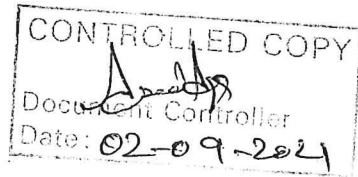
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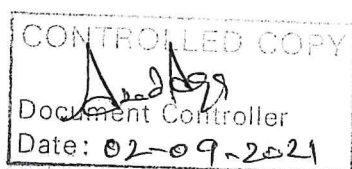
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CFO to also ensure to obtain a Chartered Accountant's / Auditors Report on utilisation of CSR funds if CSR activity is done through a third party.

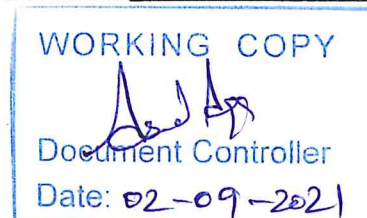
CSR internal process flow and responsibilities are mentioned in SOP- Corporate Social Responsibility HRD(CSR)613 duly amended as per extant regulations.



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ANNEXURE-I



Corporate Social Responsibility (CSR)" means the activities undertaken by a Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the provisions contained in these rules, but shall not include the following, namely:-

- (I) Activities undertaken in pursuance of normal course of business of the Company

Provided that any Company engaged in research and development activity of new vaccine, drugs and medical devices in their normal course of business may undertake research and development activity of new vaccine, drugs and medical devices related to COVID-19 for financial years 2020-21, 2021-22, 2022-23 subject to the conditions that

(a) such research and development activities shall be carried out in collaboration with any of the Institutes or Organisations mentioned hereunder;

(b) details of such activity shall be disclosed separately in the Annual report on CSR included in the Board's Report;

- (II) Any activity undertaken by the Company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;

- (III) Contribution of any amount directly or indirectly to any political party under section 182 of the Act;

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- (IV) Activities benefitting employees of the Company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
- (V) Activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
- (VI) Activities carried out for fulfilment of any other statutory obligations under any law in force in India;

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List of Activities covered under Schedule VII of Companies Act 2013

- (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

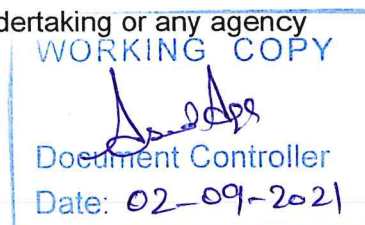
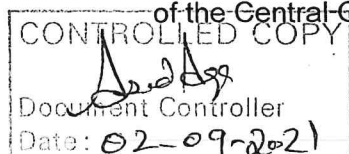
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maintaining quality of soil, air and water 48 [including contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of river Ganga;

- (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) Measure for the benefit of armed force veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- (vii) Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympics sports;
- (viii) Contribution to the Prime Minister's National Relief Fund or Prime Minister's Central 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 Scheduled Castes, the Schedule Tribes, other backward classes, minorities and women;
- (ix) (a) Contribution to 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



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(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)

(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.

(xii) Disaster management, including relief, rehabilitation and reconstruction activities

