

CSR Policy

I. PREAMBLE

Feedback Infra Private Limited (FIPL) has always been a strong proponent of sustainable infrastructure development that keeps the needs of all stakeholders in focus. The company wholeheartedly endorses the new introduction in the Companies Act, 2013 (Act) and commits to comply earnestly.

Corporate Social Responsibility (CSR) is a form of corporate self-regulation integrated into a business model. CSR policy functions as a self-regulatory mechanism whereby a business monitors and ensures its active compliance with the spirit of the law in the instant case which is Companies Act, 2013 (Act) and the ethical & social standards. CSR goes beyond compliance and engages in "actions that appear to further some social good, beyond the interests of the firm and that which is required by law." CSR aims to embrace responsibility for corporate actions and to encourage a positive impact on the environment and stakeholders including consumers, employees, investors, communities, and others.

II. OBJECTIVE

The main objective of the CSR policy of the Company is to lay down guidelines to make CSR a key business process and involve all employees of the Company to work for improving the quality of life for chosen communities from time to time. It aims to meet the social responsibilities of the Company through activities and programs that are in line with the CSR activities outlined in the Act and act as a good Corporate Citizen, subscribing to the principles of Global Compact for implementation.

III. AREAS TO BE COVERED

The Company will work in areas that enhance the wellbeing of communities while complementing the development of sustainable infrastructure in the country. This it will do by designing and implementing specific CSR projects in the following areas:

- i Water & Sanitation
- ii Education
- iii Health care
- iv Environmental sanitation
- v Renewable energy
- vi Infrastructure development
- vii Skill building and employability
- viii Empowerment of women
- ix institutional strengthening for improved service delivery.

The above list is illustrative and not exhaustive. The CSR Committee of the Company may add activities in the above list from time to time. However, addition, if any, would be in compliance to the provisions of the Act.

The Company, in the initial years, has chosen to spend time and resources in accordance with the provisions of the Act by creating a Model Village in the vicinity of the Corporate Headquarters.

A Model Village is defined as a sustainable rural community that is able to generate and maintain the resources necessary to improve its level of wellbeing and happiness without depleting economic, social & environmental values. In doing so, the Model Village strengthens the sustainability of “Livelihood”, “Infrastructure” and “Supply Chain/Services”.

The Model Village Plan is a natural next step in line with FIPL’s focus on Infrastructure and presents a holistic mechanism of bringing about sustainability of a village community unit.

The Model Village will serve the purposes of learning, demonstration and replication.

The approach will be through an integrated, holistic and inclusive model with convergence with the Government and other corporate stakeholders. The project will be implemented by Feedback Foundation Charitable Trust (FFCT).

The Company may also contribute amounts to the Prime Minister’s Relief Fund from time to time and such funds will qualify as CSR expenditure for that specific year.

IV. IMPLEMENTATION

The CSR Committee of the Company would, from time to time decide the activities to be undertaken from the above list of activities which would hereinafter be referred to as CSR Project.

For every CSR Project time framed periodic mile stones would be finalized in mutual understanding of the CSR Committee and the implementing agency.

For the Model Village Project, post the approval of the CSR Committee, FFCT would be free to deploy the funds to be allocated by the Company in any of the activities listed above and as per the stages and time frames detailed in the Project Proposal

FIPL may also motivate its employees to volunteer on CSR Projects it undertakes. This, it is believed, would not only bring in effective monitoring of the Projects but also pave the way for employees of the Company to become socially responsible citizens.

V. OVERALL ADMINISTRATION

Mrs. Rumjhum Chatterjee, member CSR Committee shall be in charge of the CSR activities of the Company and shall act as overall administrator on behalf of the Committee to undertake the CSR activities. She along with FFCT officials would be reporting back to the CSR Committee at periodic intervals on the progress of the CSR Project.

She shall also make all efforts to encourage employees of the Feedback Group to volunteer their time to work on CSR Projects. Additionally, the cost of those employees who are identified to lead activities on the project for some length of time will be captured as part of the CSR costs post the approval of the CSR Committee.

VII. MONITORING

- a) Generally the meetings of the CSR Committee would be convened along side the Board Meetings of FIPL, however, the CSR Committee would be at liberty to convene its meetings as and when deemed necessary. There would be at least two meetings of the CSR Committee in a year.
- b) Reporting would be done in accordance with the provisions of the Act.
- c) CSR Policy of the Company shall also be placed on the website of the Company at www.feedbackinfra.com.

VIII. SOURCE OF FUNDS

The funds for CSR should be allocated based on 2% of the average net profits of last three financial years.. The CSR Committee would be at liberty to invite voluntary funds from the employees of Feedback Group and other legal sources to be used for the CSR Project.

IX. DISCLOSURE OF CSR ACTIVITIES

The CSR activities to be performed by the Company shall also be disclosed in the Annual Report and Accounts of the Company in accordance with the provisions of the Act.