Corporate Social Responsibility Policy

I INTRODUCTION

The Corporate Social Responsibility (CSR) activities of Forbes & Company Limited shall be governed by the provisions of Section 135 and Schedule VII of the Companies Act 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended from time to time).

The Company is committed to its stakeholders to conduct business in an economically, socially and environmentally sustainable manner that is transparent and ethical.

The Company is committed to inclusive, sustainable development and contributing to building and sustaining economic, social and environmental capital and to pursue CSR projects that are replicable, scalable and sustainable, with a significant multiplier impact on sustainable livelihood creation and environmental replenishment.

CSR Vision: "Creating a Sustainable and Responsible business"

CSR Mission: Enriching people's lives with due care towards the society's environmental responsibilities.

II DEFINITIONS

"Act" shall mean the Companies Act, 2013 as amended from time to time and the Rules framed thereunder.

"CSR Committee" shall mean the Corporate Social Responsibility Committee of the Board.

"Board" shall mean the Board of Directors of the Company.

"Company" shall mean Forbes & Company Limited.

"Policy" shall mean Corporate Social Responsibility Policy of the Company

III CSR POLICY

- 1. The CSR Committee of the Board shall be constituted in accordance with the Act. The CSR Committee shall meet at such intervals as its members deem necessary to perform the duties and responsibilities.
- 2. Duties & responsibilities of CSR Committee shall include:
 - a) Review of the CSR activities to be undertaken by the Company. The CSR Committee shall be guided by the list of activities specified in Schedule VII to the Act and this Policy;
 - b) Formulate and recommend the projects to be supported to the Board and the CSR activities/programs to be undertaken by the Company;
 - c) Recommend the CSR expenditure to be incurred on the CSR activities/programs;
 - d) Institute a mechanism for implementation of the CSR projects and activities and effectively monitor the execution of the CSR activities;
 - e) Appointment of a working group called the CSR Team to help it enable the implementation of the CSR projects/activities; and
 - f) Such other responsibilities as may be entrusted by the Board from time to time.

- 3. The Annual CSR Plan and Budget shall be finalized in consultation with the Chairman and Managing Director of the Company.
- 4. The Company may undertake and implement its CSR activities through a registered trust or registered society or a Section 8 company (Non-profit entity). In case such trust, society or a Section 8 company is not established by the company or its holding or subsidiary or associate company, then such an entity will need to have a 3 years track record of undertaking similar projects or programmes. The Company may identify a partner in the form of a Non-Government Organization, any Government body or a Panchayat in the execution of any of its projects.
- 5. All CSR Projects shall be recommended by the Committee and approved by the Board.
- 6. Periodic CSR update, including achievement of deliverables shall be shared with the Chairman and the Managing Director.
- 7. Focus Areas for CSR shall be as per Annexure I and Methodology to be adopted shall be as per Annexure II.
- 8. The Company shall spend at-least 2% of average net profits made during immediately preceding 3 financial years in every financial year in accordance with the Policy.
- 9. The Policy shall be displayed on the website of the Company. The Annual Report of the Company shall include details of the CSR activities undertaken in the financial year and shall contain such other details and disclosures as are required under the Act.

IV APPLICABILITY

This Policy shall be applicable from the financial year 2014-15.

VI INTERPRETATION & REVIEW

- 1. Subject to the superintendence of the Board, this Policy shall be interpreted and administered by the CSR Committee.
- 2. The provisions of the Act and the Rules framed thereunder shall be deemed to have been mutatis mutandis specifically incorporated in this Policy and in case any of the provision of this Policy is inconsistent with the provisions of Act, the provisions of Act shall prevail.
- 3. The capitalized words not specifically defined in the Policy shall have the same meaning as under the Act.
- 4. For interpretation of this Policy, reference and reliance may be placed upon circulars/clarifications issued by the Ministry of the Corporate Affairs and/or any other authority.
- 5. CSR Committee may review Policy from time to time and make recommendations for amendment as it may deem appropriate.

Focus Areas for CSR

- Health.
- Education.
- Environment Preservation.
- Rehabilitation of families affected by natural calamities.
- General improvement in quality of life.

Health shall cover WaSH that is, Water, Sanitation, and Hygiene leading to better Health. Our goal here will be to work towards long-term impact by changing habits, inculcating awareness of safe drinking water, good sanitation and hygiene. Providing necessary infrastructural support, for example, community level drinking water plants, filters, educating and creating awareness on need for safe water and hygiene. To enable sustainability, the local community will be equal participants in such programmes, contributing to actual construction, monitoring, maintaining and reporting on impact and usage. Also, providing affordable world-class health care facilities to the under privileged.

Education shall seek to mainstream children, with special focus on children of underprivileged sections of the society, by providing them with non-formal schooling opportunities which can translate later to formal school admissions. Also, supporting tribal schools in the far-flung hamlets and convert them into 'model' educational institutions. Skill based training to young adults will be achieved through livelihoods skills' programmes.

Environment Preservation includes adopting energy conservation practices, Measuring and reducing carbon footprint, involving employees in conservation practices, utilizing environment-friendly materials and rainwater harvesting and water conservation. Setting a goal to 'green our planet' consciously by planting trees.

Rehabilitation of families affected by natural calamities includes providing assistance to Government agencies involved in 'Search and Rescue' operations in areas of our country that are struck by natural calamities like floods, earthquakes or cyclone and providing psychological or material assistance to help distressed persons of such areas to return to their natural ways of living.

General improvement in quality of life will include development of the urban poor specially those who are impacted by re-development projects, differently abled youth to make them employment worthy, financial inclusion facilities for the poor workers.

The Company may also undertake other CSR activities as permitted in Schedule VII of the Act.

Methodology

Identification of Projects, Selection of Partners, Setting Measureable Objectives with Timeframe and Reporting

The focus areas for CSR shall serve as the Guideposts for selection of Projects and shall be pursued in the following manner:

- a) Detailed project reports with objectives, impact areas, targets, beneficiaries and timeframe.
- b) Partnership with organizations like Non Government Organizations, village panchayats, local government and district authorities may be engaged so as to enable wider reach and leverage upon the collective expertise and experience.
- c) The primary work should be sustainable projects, charity efforts shall be solely for medical aid, educational aid and alleviation of poverty.

General Guidelines for Operations

- a) The CSR Team shall be made the 'Project Custodian' depending on the scope of the project.
- b) The CSR activities shall be monitored directly by the Managing Director of the Company.
- c) Employee engagement through volunteering shall be promoted in the Company.