

Summit Securities Limited

Corporate Social Responsibility (CSR) Policy

1. Policy Statement:

At Summit Securities Limited ('Summit' / 'the Company'), we believe that Corporate Social Responsibility (CSR) is an integral part of our Company's ethos and one of our core business tenets.

As a responsible business corporation, the Company takes pride in implementing CSR activities to address key societal needs, both in the communities we operate in and the society at large. Our CSR activities are aligned with the Sustainable Development Goals (SDGs)* established by the United Nations and we are working towards influencing micro and macro level development indicators in our target geographies. We also encourage our employees to volunteer and participate in our CSR activities, thereby building a culture of social responsibility and giving them an opportunity to give back to the communities they live with.

2. CSR Purpose & Vision:

Our purpose is to support communities to lead purposeful, happy & dignified lives thereby driving *"holistic empowerment"* and overall well-being of the community. Our vision is to bring about a long term sustainable change in the lives of less privileged through implementation of initiatives that have a clear societal impact and contribute towards the growth and development of the nation.

3. CSR Philosophy and Approach:

The Company proposes to create social impact through 'hands on' execution of the social initiatives. We will also strive to contribute towards the SDGs established by the UN and play our part as a responsible Indian & Global corporation.

*The **Sustainable Development Goals (SDGs)** are a collection of 17 interrelated global goals set out by the **United Nations**. For more info : <http://www.un.org/sustainabledevelopment/sustainable-development-goals/>

4. **CSR Objectives:**

The Company may carry out any one or more of the CSR activities, notified under the Section 135 of the Companies Act, 2013 as may be amended from time to time, inter-alia the following:

- i. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation, including contribution to the Swachh 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 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.
- 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 art and handicrafts;
- vi. 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;
- vii. Training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports
- viii. 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 govt. for socio economic development and relief and welfare of the schedule caste, 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

(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
- xii. Disaster management, including relief, rehabilitation, and reconstruction activities.

5. CSR Strategy & Initiatives:

The Company, as part of its CSR mandate, works to contribute towards the overall growth and development of the communities in the vicinity of its factories and offices and also of other vulnerable communities where a need arises. All programs and activities undertaken as a part of CSR have a clear objective to create sustained impact, in the most efficient manner.

Some of the broad areas of intervention are as follows:

Education

Purpose: To support the transformation of the education system in India. Its interventions work to improve learning abilities in children, and support teachers to teach better, thereby supporting schools to develop high quality learning spaces. The Company's interventions in the space of education strive to ensure children have access to a holistic education.

We work with the government run schools and help teachers create safe learning spaces, where children can ask questions freely and engage in dialogue with both teachers and peers. Children feel secure, there is an absence of fear, governed by equality and equity. We also help create peer networks for the teachers, where they discuss teaching approaches, curriculum, etc., along with challenges and triumphs. Enable them to learn from each other's experiences while fostering trust and camaraderie.

Through various volunteer led interventions, digital solutions and networks, we work to create and disseminate learning resources designed in engaging formats. The education program strives to continuously transform to meet the evolving needs of today's children and teachers.

Employability

Purpose: Support women and youth to acquire vocational and other skills that lead to gainful employment and meaningful livelihood opportunities. Through this program, the Company also works to create a gender equitable society, where women have equal opportunities and rights to engage, participate and contribute towards nation building.

Our work in the skilling, employability and entrepreneurship space aims to equip women and youth from lower income groups with the necessary means to earn a livelihood. We focus on people from underserved communities who would otherwise not have access to vocational or technical training, and hence limited means to earn an income. We have special focus on first time learners - those who have not had the opportunity to acquire any vocational skills – and help them become first time earners post their training. The vision is to enable people to have better lives - amplify family incomes, make women financially independent, and create more positive contributors to growth and development.

Community Development

Purpose: Aid holistic development of communities around our plant/office locations, and that of other vulnerable communities by helping meet their critical needs and overcoming any emergencies.

Our Community Development initiatives focus on a multitude of interventions based on need and a continuous engagement with our communities to help them to improve their lives in the following areas:

- Water and Sanitation: Provision of drinking water and rain water harvesting structures as well as building toilets and creating sanitation awareness in schools, communities, etc.
- Community Health: Health awareness sessions for women, adolescents & children; initiatives to reduce levels of malnutrition among children, etc.
- Community Mobilization: Work closely with the community to make them aware of their rights and support them to develop unique solutions to their own problems.
- Environment and Biodiversity: Engage with communities to build an awareness for biodiversity, undertake activities and projects to protect our environment and promote preservation of environment as a value.
- Health Emergencies: Support communities to meet any critical needs during health emergencies.

Heritage Conservation and Revival

Purpose: Make heritage accessible and engaging for all and focus on revival of sites of cultural and historical significance.

Our conservation efforts are focussed on both built heritage and other forms. While we contribute towards the physical restoration of heritage sites and monuments, we have special focus on revival of the sites – we work to raise awareness on the sites, encourage people to visit and create engaging experiences for them. The aim of the program is to encourage public participation, create a sense of ownership and pride in citizens, which we believe would lead to continued upkeep and conservation efforts.

6. CSR Governance & Implementation:

The Board of Directors of the Company (“Board”) will inter-alia be responsible for the following:

- a. Formulate and adopt CSR Policy.
- b. Review CSR Policy from time to time.
- c. Give strategic direction to the CSR initiatives.
- d. Formulate and approve an Annual Action Plan for the CSR activities to be undertaken with the execution modalities, implementation schedules etc.
- e. Recommend the amount of expenditure to be incurred on various CSR activities.
- f. Monitor and report to the Board the progress on various chosen projects for CSR activities.

Company’s CSR initiatives shall be implemented directly and / or through the RPG Foundation for the purposes of accessing expertise/enhancing resources and for support in project implementation. RPG Foundation is registered with Ministry of Corporate Affairs with registration number as CSR000000030 and also under Section-12A and 80G of Income Tax Act, 1961.

Any surplus arising out of the CSR projects or programs shall not form the part of the business profits of the Company and would be ploughed back to the CSR corpus for spending on CSR projects only.

Company will be allowed to set-off excess amount, if any, that may have been spent in excess of the requirement provided under sub section (5) of Section 135, in the three succeeding financial years, subject to compliance to certain conditions laid down under amended Section 135 read with the Rules.

7. Monitoring of CSR Initiatives:

The Board will be responsible to monitor the CSR implementation of the CSR initiatives inter-alia through:

- a. Programme Planning
- b. Implementation plans and schedules
- c. Periodic review
- d. Situational and other assessment tools
- e. Any other tools

8. Miscellaneous:

- a. The Board shall spend at least 2% of its average profit determined in accordance with the provisions of Section 135 of the Companies Act, 2013 and Rules made thereunder, through the CSR initiative described herein, which may either be revenue or Capex. The Board may, at its discretion, also recommend contribution to the Prime Minister Relief Fund or any other prescribed Government Funds under Schedule-VII of Companies Act, 2013.
- b. Activity outside India will not be considered as a CSR activity.
- c. Any project or programme benefiting only the employees of the Company, or their families shall not be considered a CSR activity.
- d. The contribution, if any, made by the Company to RPG Foundation or other entities mentioned herein, the Board shall ensure that such contributions are used for specified projects or programmes. The Board shall also specify the monitoring and reporting mechanism for such projects or programmes.

9. Reporting and Communications:

- a. The CSR Policy and Projects approved by the Board shall be displayed at the Company's web site for information of all the stakeholders.
- b. A report on details of CSR activities such as CSR projects and activities, programme locations, progress, budget and actual spends of the CSR projects etc. shall be included in the Company's Annual Report. This report shall follow the format if any prescribed under the provisions of the Companies Act, 2013.

10. Our Implementation Partner

RPG Foundation is a Public Charitable Trust registered under the Bombay Public Trust Act 1950, created to function as a centralized body for implementing CSR activities of the various companies of the RPG Group of Companies.

RPG Foundation will work as the core implementation partner for the Company and will create cross-company/NGO synergies to encourage exchange of CSR ideas, best practices and learning.

The Company also encourages building other partnerships as required with Government Organizations (GOs), Non-Government organizations (NGOs), CSR departments of various companies and Private entities like local Municipal Corporation, other local government bodies, etc. to build sustainable impact and reach out to a large and varied section of the society.

11. Amendments to the Policy

The Board may amend this Policy, as and when it may deem fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail notwithstanding the provisions hereunder, from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc. Whereas, in case of a conflict with any other laws, provisions of Section 135 of the Companies Act; 2013, shall prevail.

12. Guiding Principles under CSR Policy

Guiding principles for selection of CSR activities and implementation and monitoring of CSR activities are enclosed as an Annexure to this Policy.

ANNEXURE

GUIDING PRINCIPLES UNDER CSR POLICY

I. Guiding principle for selection of activities

The CSR Activities for the Company are carried out by RPG Foundation (RPGF), Implementing Partner and following guiding principles for selection of CSR activities shall be followed: -

1. **Activity:** CSR activities permitted in Schedule VII of the Companies Act, 2013 as may be amended from time to time, only should be undertaken in close coordination with RPGF and the Board.
2. **Location:** Preference should be given to the local areas in India where the Company operates, to the extent reasonably possible.
3. **Benefits:** Priority should be given to projects which will bring long term, sustainable and lasting benefits to the community. Emphasis to be given on long term viability of activities which have the potential of remaining viable even upon disengagement at the end of the project period.
4. **Budget allocation:** Company shall spend, minimum two percent (2%) of the average net profits made during the three immediately preceding financial years, for CSR activities. The spend on any identified activity should be decided on the need assessment either undertaken by the Company or RPFPG.

II. Guiding principle for implementation and monitoring of activities

1. Once the CSR projects or programs are identified and finalized, RPFPG should make a schedule for implementation along with milestone thereof. Unless it is an Ongoing project, the entire CSR activities should be fully implemented before the close of the financial year.
2. For Ongoing project, year wise budget would be allocated and milestones of completion should be defined and adhered to.
3. As far as possible every effort should be made to ensure that approved CSR activities are implemented in line with the implementation schedule(s) shared with the Board which forms part of the Annual Action Plan.
4. For monitoring, RPFPG implementing the projects or programs shall place reports/update(s) at Board meeting(s).
5. Company shall review its average CSR obligation to ascertain the applicability of the impact assessment, if any, through an independent agency, of CSR projects. In such cases, the impact assessment reports should be placed before the Board and shall be annexed to the annual report on CSR, if required.
6. The Guiding principles set out hereunder are indicative and not exhaustive and the Board is permitted to carry out such changes herein, as deemed fit and expedient, from time to time.