



**WEST BENGAL POLICE HOUSING & INFRASTRUCTURE
DEVELOPMENT CORPORATION LIMITED**

CORPORATE SOCIAL RESPONSIBILITY POLICY

WBPHIDCL CORPORATE SOCIAL RESPONSIBILITY POLICY

This policy may be called the “West Bengal Police Housing & Infrastructure Development Corporation Limited Corporate Social Responsibility Policy”. The policy has been formulated in compliance with Section 135 of Companies Act, 2013 (the ‘Act’) read along with applicable rules thereto.

1. Definitions:

- (i) ‘**Act**’ means Companies Act, 2013 and rules thereunder.
- (ii) ‘**Board**’ means the Board of Directors of WBPHIDCL.
- (iii) ‘**Company**’ means West Bengal Police Housing & Infrastructure Development Corporation Limited (WBPHIDCL).
- (iv) ‘**CSR Committee**’ means the Corporate Social Responsibility Committee as constituted or reconstituted by the Board from time to time.
- (v) ‘**CSR Policy**’ means the policy framed by the CSR Committee to carry out CSR activities in accordance with schedule VII of the Act.
- (vi) ‘**Director**’ means a Director of the Company.
- (vii) ‘**Net Profit**’ means the net profit of the Company as calculated under provisions of section 198 of the Act.
- (viii) ‘**Ministry**’ means the Ministry of Corporate Affairs of Government of India.

2. Objectives:

This Policy intends to:

- (i) Strive for economic development that positively impacts the society at large with minimal resource.
- (ii) Embrace responsibility for Company’s actions and encourage a positive impact through its activities on hunger, poverty, malnutrition, environment, communities, stakeholders and the society.

3. Scope:

This policy will apply to all projects/ programmes undertaken as part of the Company’s Corporate Social Responsibility and will be developed, reviewed and updated periodically with reference to relevant changes in corporate governance and sustainable and innovative practices. The policy will maintain compliance and alignment with Section 135 of the Act and Schedule VII thereto.

4. Roles and Responsibilities of the Board:

The Board of the Company will be responsible for:

- (i) Constituting a CSR Committee.

- (ii) Approving the Company's CSR Policy, CSR action plan and budget placed by the CSR Committee.
- (iii) Ensuring that the Company spends, in every financial year, at least two percent of the Company's average net profit, made during the three preceding financial years.
- (iv) Make any change(s) in the constitution of the CSR Committee from time to time.

5. Composition of the Committee:

The Committee shall comprise of at least three directors as members of the Committee and one member shall be an independent director.

One member shall be elected as Chairman of the Committee by the Board or by the members themselves, by majority vote. Company Secretary shall act as Secretary of the Committee.

6. Roles and Responsibilities of the Committee:

The responsibilities of the Committee include:

- (i) Formulating and recommending to the Board of Directors the CSR Policy and indicating activities to be undertaken,
- (ii) Reviewing and recommending the amount of expenditure/ annual budget for the CSR programmes/ activities,
- (iii) Ensuring that the programmes/ projects undertaken by the Company on its own or through implementing partners are aligned with the approved CSR policy of the Company and are also aligned to Schedule VII of the Act,
- (iv) In case, the Company is not able to spend the stipulated two percent of the average net profits of preceding three financial years or any part thereof, the CSR Committee shall provide the reasons for not spending the amount to the Board and such reasons shall also be included in the Board's Report,
- (v) Monitoring CSR activities from time to time,
- (vi) Respond to any query, observation or clarification sought by the Ministry or any other regulatory authority with regard to the Company's CSR supported initiatives, and
- (vii) Any other responsibility as may be suggested by the Board.

7. Focus Areas

In accordance with the requirements of Companies Act, 2013, WBPHIDCL CSR activities, amongst others, focus on:

- (i) **Hunger, Poverty, malnutrition and health:** Eradicating extreme hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water.

- (ii) **Education:** Promoting education including special education and employment enhancing vocation skills especially children, women, elderly and the differently abled and livelihood enhancement projects, monetary contributions to academic institutions for establishing endowment funds, chairs, laboratories, etc., with the objective of assisting students in their studies.
- (iii) **Gender Equality and Empowerment of women:** 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) **Environmental Sustainability:** Ensuring environmental sustainability, ecological balance, protection and flora and fauna, animal welfare, agro forestry and conservation of natural resources and maintaining quality of soil, air and water.
- (v) **National Heritage, Art and Culture:** Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art, setting up public libraries, promoting and developing traditional arts and handicrafts.
- (vi) **Rural Development Projects:** Strengthening rural areas by accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.

8. Governance and implementation

- (i) The CSR activities shall be undertaken by the Company as projects or programs or activities, excluding activities undertaken in its normal course of business.
- (ii) The Company may invest and/or contribute to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and funds for the welfare of the scheduled castes, the scheduled tribes, other backward classes, minorities and women.
- (iii) The investment in CSR should be project based and for every project time framed periodic milestones should be finalised at the outset. One-off events such as marathons/ awards/ charitable contribution/ advertisement/ sponsorships of TV programs etc. would not be considered as part of CSR activities.
- (iv) The Company may decide to undertake its CSR activities, approved by CSR Committee, through a registered trust or a registered society, or a non-profit company under section 8 of the Act or otherwise, established by the Company.
Provided that if such trust, society or company is not established by the Company, it shall have an established track record of three years in undertaking similar programs or projects.
- (v) The Company may enter into partnership or alliances with NGOs, other Trusts, etc to create a multiplier effect of its CSR programmes/ projects.
- (vi) The Company may also implement programmes in collaboration with other companies such that the CSR Committees of respective companies are in a position to report separately on such programme/project.

- (vii) The CSR Committee shall provide guidelines for projects and will ensure that the projects/ programmes are compliant with the regulations and reported effectively.
- (viii) Any surplus arising out of the CSR projects/programs or activities shall not form part of the business profit of the company.

9. Meetings

The Committee shall meet periodically as deemed fit by it. The Committee may invite such of the executives, as it considers appropriate, to be present at the meetings. The right to vote shall vest only in the members of the Committee.

10. Review of the Policy:

The adequacy of this Policy shall be reviewed and reassessed by the Committee and appropriate recommendations shall be made to the Board to update the same. Any modification/amendment in the CSR Policy shall be carried out with the prior approval of the Board.
