



L&T – Sargent & Lundy Limited

Corporate Social Responsibility Policy



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Corporate Social Responsibility (CSR) Policy Framework

01. CSR Philosophy

L&T-Sargent & Lundy Ltd ('the Company') fosters a culture of caring, trust and continuous learning while meeting the expectations of all stakeholders and society at large. As a responsible Corporate Citizen, the Company contributes towards inclusive growth by empowering communities and accelerating development.

The Company's CSR Policy framework details the mechanisms for undertaking various programs in accordance with section 135 of the Companies Act 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (CSR Rules)(as amended from time to time) made thereunder for the benefit of the community.

02. CSR Themes

The Company shall undertake CSR projects in sectors as identified under Schedule VII of the Companies Act, 2013 with special focus on the following four verticals:

- (a) Water & Sanitation** – includes but not limited to watershed development-making clean drinking water available, promoting rain water harvesting, soil and moisture conservation, enhancing ground water levels by facilitating community management of water resources for improving conditions related to sanitation, health, education and livelihoods of communities through an integrated approach.
- (b) Education** – includes but not limited to education infrastructure, support to educational institutions, educational programs & nurturing talent at various levels.
- (c) Health** - includes but not limited to community health centres, mobile medical vans, dialysis centres, general and specialized health camps and outreach programs, support to HIV / AIDS, Tuberculosis control programs.
- (d) Skill Development** – includes but not limited to vocational training such as skill building, computer training, women empowerment, support to ITI's, support to specially abled(infrastructure support & vocational training), Construction Skills Training centres and providing employability skills to women and youth.

Governance, Technology and Innovation would be the Key enabling factors across all these verticals.



03. CSR Budget

- The Board of the Company shall allocate at least 2% of the average net profits (*Net profit to be calculated in accordance with the provisions of Section 198 of Companies Act, 2013*) during the three immediately preceding financial years.
- The Company may collaborate or pool resources with other entities to undertake CSR activities or projects in accordance with the CSR Rules.
- In case of any surplus arising out of CSR programs the same shall not form part of business profits of the Company.

04. CSR Governance Structure

The CSR Governance structure comprises of the CSR Team, CSR Committee and Board of Directors of the Company to oversee the implementation of the CSR Policy.

(a) The Board of Directors:

The Board of Directors of the Company will:

- Approve the CSR Policy of the Company;
- Ensure spend of at least 2% of average net profits during the three preceding financial years;
- Disclose the content of the CSR Policy in its report and place the Policy and provide details of the Committee Composition on the Company's website, if any, as prescribed under Section 135 of the Companies Act 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014;
- Ensure that the social programs undertaken are aligned to the CSR Policy of the Company;
- Specify reasons in its report for not spending the earmarked amount in case the Company fails to spend such amount;
- Approve the Annual Action Plan as recommended by the CSR Committee;
- Oversee and adhere to all other responsibilities as mandated by the CSR Rules.



(b) The CSR Committee:

The Board has formed the CSR Committee in accordance with the requirements of the Companies Act, 2013.

Responsibility of the CSR Committee:

The responsibility of the CSR Committee shall include:

- Formulate and recommend the CSR Policy to the Board for approval;
- Monitor and review the Policy from time to time;
- Recommend the activities to be undertaken and the amount of expenditure (Budget) to be incurred on CSR activities;
- Recommend the Annual Action Plan to the Board for approval.

(c) The CSR Team:

Responsibilities of the CSR Team:

- Spread awareness regarding the approved CSR policy;
- Keep reviewing the CSR policy and actual implementation status to achieve desired outcome for community development;
- Receive the projects, analyze their utility and efficacy, and suggest suitable changes / modifications in the CSR activities in line with the CSR policy;
- Recommend programs to be undertaken during the financial year to the CSR Committee of the Board;
- In case Projects / Programs are being planned to be executed through partners, the CSR Team will verify and establish the credibility of such partners;
- Ensure compliance of the Rules/ Regulations/ Law by the partnering agency, if any;
- Monitor the progress of the CSR programs closely and report to CSR Committee appropriately.



05. Implementation

- CSR projects/programs will be undertaken by the Company in identified areas. The Company will undertake need assessments as and when required;
- The Company will undertake its CSR activities whether directly as projects/programs/activities or through partners such as NGOs, Registered Trust, business associates or by contributing to the CSR team of the holding Company. The Company will select its partners after appropriate due diligence;
- The time period/duration over which a particular program will be spread, will depend on its nature, extent of coverage and the intended impact of the program;
- The Company may enter into partnerships with the Government, Business partners and communities to create multiplier effect of its social programs;

The Company may use the services of internal teams, volunteers, expert agencies, consultancy firms etc wherever required for carrying out the base line surveys, guidance on program design and implementation, impact assessment surveys etc.

06. CSR Monitoring and Reporting Framework

To ensure transparency and effective implementation of the CSR projects/programs, a robust mechanism will be instituted by the Company. An accounting system has been established by the Company to ensure appropriate accounting of CSR spends. The CSR Team shall be responsible for monitoring and implementing the CSR programs.

At CSR Committee level:

- The CSR Committee will review the implementation of the CSR programs and the CSR audit reports periodically, preferably on a half yearly basis and arrange to share in the Company the best practices;
- Review the implementation and monitoring mechanism appropriately;
- Report to the Board appropriately.

The Chief Financial Officer or the person responsible for financial management shall certify the funds disbursed has been utilized for the purposes and in the manner as approved by the Board.



07. CSR Disclosure

The CSR Policy framework, Committee composition and projects approved by the Board (Annual Action Plan) will be displayed on the website of the Company. The Board Report will include an Annual report on the CSR activities in the format specified under the CSR Rules.

08. General Provisions

In case of any surplus arising out of CSR programs the same shall not form part of business profits of the Company.

No contribution shall be made to any political party through CSR Fund.

The CSR projects/programs or activities that benefit only the employees of the Company and their families shall not be considered as CSR activities in accordance with Section 135 of the Act.
