

FRONTLINE SECURITIES LIMITED  
(FSL)

*CSR POLICY*



## ***The CSR Concept & Applicability***

*Corporate responsibility towards the stakeholders is fast emerging as one of the major considerations for businesses in the country. Organizations are gradually shifting their attention towards a wider view of social concerns while conducting their businesses. Corporate Social Responsibility (CSR) aims at connecting business to the society, wherein the business chooses areas of engagement with the local communities and people at large. The broader objective of CSR is to contribute with a responsibility, towards a better society and a cleaner environment.*

*FSL engages in providing financial solutions to all segments of society. Our business model is woven around complementary, high-growth business segments across five core business structures: **Wealth Management, Mutual Fund Distribution, Corporate Advisory, Insurance Planning, and Wealth Management Software**. All of the five core business structures share Sustainability as one of their Core Values.*

*While this Policy document defines the CSR Vision of FSL, it explains the structure and method of implementation. The Policy is in compliance with **Section 135** of the Company Act, 2013 and the rules notified there under. Due considerations were also given to **Schedule VII** of the Act while identifying the focus areas of CSR programs.*



## **CSR VISION & GOALS**

*FSL has a CSR vision to uphold human values with sustainable community development. The development will facilitate equal opportunities to everyone irrespective of caste, class, colour, gender and religion, leading to self-reliance. FSL aspires to be known to society as a group which cares and seeks to build-up capacities of the underserved, marginalized and disadvantaged by working together, with and for them. This aspiration includes all aspects of human development for a dignified living. Leadership team and employees' participation will be an integral part of CSR.*

## **FSL CSR THRUST AREAS**

*In line with the CSR Vision and Goals, the group will design all its CSR interventions, emphasizing on 'capacity building' of the underserved and marginalized. Under capacity building, major emphasis will be given to programs that equip women & youth to be drivers of change and children as the future of a maturing economy.*

*FSL CSR Thrust Areas are divided into the following two sections:*

### **Primary CSR Thrust Areas**

#### **1. Quality Education**

*We seek to achieve a better tomorrow through the medium of quality education and unleash the power of knowledge that is inaccessible to millions.*

*FSL will have structured long term engagement with orphanage education. Quality Education shall also include Financial Literacy initiatives for the society at large.*

#### **2. Generating Sustainable Livelihoods**

*FSL will facilitate in setting up old age homes. Focusing on the three main requirements of senior citizens viz. social interaction, financial security and balanced health & wellbeing.*

*We (FSL) strongly feel that older persons should be able to pursue opportunities for the full development of their potential and have access to educational, cultural, spiritual and recreational resources of society.*

### **Secondary CSR Thrust Areas**

#### ***1. Protection, Preservation and Promotion of Indian Art and Culture***

*Supporting programmes and projects related to preservation, training and promotion of Indian Art and Culture, including classical music, folk and tribal art forms.*



## ***2. Preservation of Environmental Sustainability***

Promoting and practising the principles of Reduce, Reuse and Recycle. Ensuring integrity towards ecosystem.

## ***3. Healthcare***

*Supporting interventions related to preventive and curative healthcare.*

**4. Contribution 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 welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women.**

**5. Rural development projects.**

**6. Training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports.**

**7. Measures for the benefit of armed forces veterans, war widows and their dependents.**

## **ADMINISTRATION**

### **ROLES AND RESPONSIBILITIES**

#### **Board**

- ☐ Ensuring that the CSR Activities included by each Company in its CSR Policy are related to the activities included in Schedule VII of the Companies Act 2013
- ☐ Approving the CSR policy as recommended by the CSR Committee
- ☐ Ensuring that in each financial year, the Company spends the approved budget in compliance with the Companies Act 2013 - Section 135 and notified rules
- ☐ Ensuring that every financial year, funds committed by the Company for CSR activities are utilized effectively and monitored as per a structured process

#### **CSR Committee**

- ☐ Recommending the CSR policy in compliance with Section 135 of the Companies Act 2013
- ☐ Identifying and recommending CSR activities and budget to the Board for approvals
- ☐ Instituting a transparent monitoring mechanism for implementation of the CSR projects and interventions undertaken by the Company

#### **CSR Team**

- ☐ Ensure structured Planning and effective delivery of CSR interventions
- ☐ Ascertain financial management and transparency in project funds
- ☐ Set up effective and structured evaluation and monitoring mechanism for CSR projects and interventions
- ☐ Document & periodically report to the CSR Committee and other internal and external stakeholders

#### **Budget Allocation**

- ☐ For achieving its CSR objectives, the Company concerned would allocate adequate CSR funds, with the approval of the Board.
- ☐ The surplus arising out of the CSR Projects or programmes or activities shall not form part of the business profit of the Company.



## PLANNING

*FSL CSR programs will be identified and implemented according to the Board approved CSR policy.*

*The Company will establish a robust project monitoring and evaluation mechanism so as to ensure every program is in accordance with the notified rules u/s 135 of the Companies Act 2013.*

## MONITORING & REPORTING

### **Periodic Monitoring & Reporting**

*To ensure effective implementation of the FSL CSR interventions, a structured monitoring mechanism will be put in place by the CSR Team and governed by the CSR Committees.*

- ☐ *Appropriate documentation of the CSR Policy, annual CSR activities, executing partners, and expenditure entailed will be undertaken on a regular basis and the same will be available in the public domain.*
- ☐ *CSR initiatives of FSL will also be reported in its Annual Report.*

## FSL CSR COMMITTEE BOARD MEMBERS

*FSL CSR Committee consists of:*

<b>S.No.</b>	<b>Board Of Director</b>	<b>Designation</b>
<i>1</i>	<i>Gauri Shanker Pandey</i>	<i>Whole Time Director</i>
<i>2</i>	<i>Atul Kumar Jain</i>	<i>Independent Director</i>
<i>3</i>	<i>Arun Kumar Jain</i>	<i>Independent Director</i>



## **ANNUAL REVIEW**

*The CSR Team will prepare a half yearly report of all CSR projects and/or interventions, with or without external support. Such reports will be presented to the CSR Committee on or before a date prescribed by the Committee.*

## **DOCUMENTATION & DISSEMINATION**

*The CSR Committee will be authorized to approve budgets for documentation of case studies of CSR Programmes. Written documents, films and web-based materials will be created and archived for future reference.*

*The CSR Team will also arrange training sessions or similar events to disseminate such information among the Members of FSL or outside. Scope of such activities may also include supporting events organized by other agencies in which these information would be shared among the Indian and global citizen. This information will be available in the public domain or will be accessible to interested citizens for research or similar knowledge dissemination. The CSR Committee is authorized to allocate budget to support such CSR capacity building activities.*

## **GENERAL**

- ☐ *As a good global citizen, we respect our customers and their culture in the countries and communities in which we operate. The company and employees work together for the sustainable development of the Earth, the environment, and society. In future we will engaged in dialogue with various stakeholders in society and incorporate their feedback into our CSR activities in order to improve our quality and effectiveness.*
- ☐ *Any or all provisions of the CSR Policy would be subject to revision/amendment as may be issued from Government or internally, from time to time.*
- ☐ *FSL reserves the right to modify, cancel, and add any provisions in the policy.*