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CSR Policy

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1	1	July 1, 2016	Reviewed and updated with no changes
2	0	Jan 18, 2017	Change in the constitution of CSR members
2	1	June 15, 2018	Reviewed and updated with no changes
2	2	July 3, 2019	Reviewed and updated with no changes
2	3	May 20, 2020	Reviewed and updated with no changes
3	0	Mar 19, 2021	Made changes as per the provisions of the Companies Act
3	1	April 5, 2022	Added changes to CSR Annual Action Plan
3	2	March 22, 2023	board member details and CSR activities updated
3	3	June 19, 2023	Registered office address change updated

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CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Introduction and Objectives

FNF INDIA PRIVATE LIMITED (Formerly known as FNF Business Process Outsourcing Services India Private Limited) ('FNF INDIA' or 'the Company') believes in making a positive difference to society and contribute its share towards the social cause of betterment of society. The Company's focus has always been to contribute to the sustainable development of the society and environment, and to make our planet a better place for future generations.

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Pursuant to Section 135 of the Companies Act, 2013, and Companies (Corporate Social Responsibility Policy) Rules, 2014 every Company having net worth of Rs. 500 crore or more or turnover of Rs. 1,000 crore or more or netprofit of Rs. 5 crore or more shall constitute Corporate Social Responsibility Committee ('CSR Committee') and the CSR Committee shall formulate and recommend Policy. This CSR policy sets out the approach and directions given by the Board taking into account the recommendations of CSR Committee to carry out CSR activities of FNF India and inter alia includes guiding principles and process for Selection, Monitoring and implementation of CSRactivities.

2. General Approach towards CSR activities


FNF India's CSR Policy intends to focus on addressing critical social, environmental and economic needs of the marginalized/underprivileged sections of the society. FNF India seeks to support organizations that strive to make advancements in following area: Eradication of poverty, preventive healthcare, community and gender empowerment, educational support, environmental protection and rural development.

This policy will be applicable to the Company effective 11 June 2015.

In accordance with the requirements under the Companies Act, 2013, FNFI CSR activities will focus on:

- i. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach 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 4[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 arts 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 recognized 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

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- Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- ix. “(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) Contribution 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 Organization (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)”. Rural development projects;
 - x. Slum area development.
Explanation.- For the purposes of this item, the term ‘slum area’ shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.
 - xi. Disaster management, including relief, rehabilitation and reconstruction activities.
 - xii. Any other activity as mentioned in SCHEDULE VII of the Companies Act, 2013 and as amended from time to time.

3. Guiding principles for Selection, Monitoring and implementation of CSR activities

Step 1: The CSR team of FNF India will set Project Criteria based on this CSR Policy and after taking into consideration direction given by the Board under Clause 2 of this Policy.

Step 2: The CSR team shall send out a ‘Call for Proposal’ to all interested organizations to send in their proposals that are to be shortlisted

Step 4: Submission of all legal documents such as registration certificate, 12 A form, 80G, three years of financial statement, PAN Card etc. by the organizations

Step 5: The selection committee will review all submissions that are received and technically disqualify the proposals which do not comply with the Project Criteria/CSR Policy of FNF India.

Step 6: The qualified proposals will be assessed by the CSR & legal team with the set project criteria. The projects will be prioritized based on the impact and will be placed before the CSR Committee for their evaluation


Step 7: The most successful project applicants will be selected by the FNF India Board Members (after taking into account the recommendation of CSR Committee)

Step 8: Drafting of MOU between both the parties for the implementation of the CSR projects

Step 9: Regular monitoring, evaluation and tracking of all project activities and timelines by FNF India during the course of project implementation. Any one or more among the CSR team, employees of FNF India who have come forward to act as CSR Volunteers and the directors of FNF India regularly visit each project area to monitor the CSR activities, witness the effective implementation of CSR activities and the impact that it has created on the social well-being.

Step 10: Upon completion of the projects, the CSR team from FNF India will further evaluate effective implementation, quality of the deliverables, and management of the programs. Grantees are also expected to present their project results and impacts along with an audited report to the FNF India’s CSR team at the end of the project period.

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Step 11: Report on status, monitoring and implementation of the projects will be placed before the CSR committee and the Board periodically.

Step 12: The Board of a company shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the person responsible for financial management shall certify to the effect

4. Formulation of Annual Action Plan

The CSR Committee shall either based on the inputs from CSR Team or on its own discretion, formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy. The Annual action plan inter-alia shall consist of following:

1. List of project – area under Schedule VII
2. Name of the implementation Agency
3. Modalities of utilization and implementation schedule for project
4. Monitor and reporting mechanism for projects
5. Need of impact assessment, if any
6. Such other details as may be prescribed under Companies Act, 2013 and rules made thereunder.

The Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect

5. Composition of CSR Committee and its meetings

The CSR Committee shall consist of the following directors:

Sl. No	Name	Designated as
1	Mr. Michael Andrew Giddings	Chairman
2	Mr. Ollukaran Inasu George	Member
3	Mr. Timothy Jay Roache	Member


An internal working group will closely work with the CSR team in its smooth functioning.

6. Meetings:

The Committee will meet periodically as necessary to act upon any matter within its jurisdiction. All Committee members are expected to attend each meeting, in person or via tele- or video-conference. A majority of the Committee will comprise a quorum when all Committee members are unable to attend a meeting. The Committee may request that other Board members, or officers or, other employees of the company, or any other persons whose advice and counsel are sought by the Committee, attend any meeting of the Committee to provide pertinent information.

7. Terms of Reference:

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1. The Committee shall formulate and recommend to the Board, a 'Corporate Social Responsibility Policy' ('CSR Policy') which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the Companies Act, 2013.
2. The Committee shall recommend the amount of expenditure to be incurred on the activities referred in the CSR Policy.
3. The Committee shall monitor the CSR Policy of the company from time to time.
4. The Committee will be responsible for reviewing and overseeing CSR Policy and political and environmental trends and public policy issues that affect or could affect the company's business activities, performance, public image and responsibilities under Indian Law.
5. The Committee will assist the Board in determining how the company can anticipate and adjust to corporate social responsibility and public policy trends in order to make more effectively achieve its goals.
6. The Committee will offer advice and counsel to management regarding the effectiveness of the company's corporate social responsibility programs and corporate citizenship.
7. The Committee will also undertake such additional activities as the Committee may from time to time determine or as may otherwise be required by law, the company's articles of association, or directive of the Board.
8. The Committee will make regular reports to the Board and will recommend any proposed actions to the Board for approval as necessary

8. Funding & Allocation


For achieving the CSR objectives through implementation of meaningful and sustainable CSR Projects, the CSR Committee will allocate for its Annual CSR Budget, 2% of the average net profits of the Company made during the three immediately preceding financial years, calculated in accordance with the relevant Sections of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014. Any unspent or amount spent in excess of CSR Budget shall be dealt in the manner specified under relevant Sections of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

9. Rules Governing the CSR Policy:

The Company shall be eligible to do all such acts in connection with its Corporate Social Responsibility as specified under the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time and in the manner specified therein. The Company shall implement the CSR activities and this policy harmoniously and in tandem with the relevant Acts and rules as prescribed

- i. The Company shall ensure that the CSR activities are undertaken by the company itself or through -
 - (a) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company, or
 - (b) a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
 - (c) any entity established under an Act of Parliament or a State legislature; or

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(d) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities

- ii. In no case, the surplus arising out of the CSR activities shall form a part of “business profits” of the Company.
- iii. ii. CSR Reporting: The Board’s report pertaining to the relevant financial year commencing on or after 1st day of April 2014, shall include an annual report on CSR containing particulars as specified under the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time. The current format has been specified in **Annexure A**.


10. List of CSR projects or programs which company plans to undertake, modalities of execution of such project or programs and implementation schedules shall be as per annual action plan approved by the Board based on the recommendation of the CSR Committee from time to time.

11. Amendment in CSR Policy:

Any modification/amendment in the CSR Policy shall be carried out by the “CSR Committee” and recommended to the Board of Directors for their approval.

This Policy will be communicated to all operational employees and other concerned persons of the Company and shall be placed on the website of the Company at www.fnfindia.in.

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ANNEXURE A

Format For The Annual Report on CSR Activities to be Included in the Board's Report For Financial Year Commencing on or After 1st Day of April, 2020

1. Brief outline on CSR Policy of the Company.

2. Composition of CSR Committee:

Sl. No.	Name of Director	Designation / Nature of Directorship	Number of meetings of CSR Committee held during the year	Number of meetings of CSR Committee attended during the year
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3. Provide the web-link where Composition of CSR committee, CSR Policy and CSR projects approved by the board are disclosed on the website of the company.

4. Provide the details of Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social responsibility Policy) Rules, 2014, if applicable (attach the report).


5. Details of the amount available for set off in pursuance of sub-rule (3) of rule 7 of the Companies (Corporate Social responsibility Policy) Rules, 2014 and amount required for set off for the financial year, if any

Sl. No.	Financial Year	Amount available for set-off from preceding financial years (in Rs)	Amount required to be set-off for the financial year, if any (in Rs)
1			
2			
3			
	Total		

6. Average net profit of the company as per section 135(5).

7. (a) Two percent of average net profit of the company as per section 135(5)

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(b) Surplus arising out of the CSR projects or programmes or activities of the previous financial years.

(c) Amount required to be set off for the financial year, if any

(d) Total CSR obligation for the financial year (7a+7b-7c).

8. (a) CSR amount spent or unspent for the financial year:

Total Amount Spent for the Financial Year (in Rs.)	Amount Unspent (in Rs.)				
	Total Amount transferred to Unspent CSR Account as per section 135(6).		Amount transferred to any fund specified under Schedule VII as per second proviso to section 135(5).		
	Amount.	Date of transfer.	Name of the Fund	Amount.	Date of transfer.


(b) Details of CSR amount spent against ongoing projects for the financial year:

(1)	(2)	(3)	(4)	(5)		(6)	(7)	(8)	(9)	(10)	(11)	
Sl. No.	Name of the Project.	Item from the list of activities in Schedule VII to the Act.	Local area (Yes/No).	Location of the project.		Project duration.	Amount allocated for the project (in Rs.).	Amount spent in the current financial Year (in Rs.).	Amount transferred to Unspent CSR Account for the project as per Section 135(6) (in Rs.).	Mode of Implementation - Direct (Yes/No).	Mode of Implementation - Through Implementing Agency	
				State.	District.						Name	CSR Registration number.
1.												
2.												
3.												
	Total											

(c) Details of CSR amount spent against **other than ongoing projects** for the financial year:

(1)	(2)	(3)	(4)	(5)		(6)	(7)	(8)	
Sl. No.	Name of the Project	Item from the list of activities in schedule VII to the	Local area (Yes/No).	Location of the project.		Amount spent for the project (in Rs.).	Mode of implementation - Direct (Yes/No).	Mode of implementation - Through implementing agency.	
				State.	District.			Name.	CSR registration

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		Act.						number.
1.								
2.								
3.								
	Total							

(d) Amount spent in Administrative Overheads

(e) Amount spent on Impact Assessment, if applicable

(f) Total amount spent for the Financial Year (8b+8c+8d+8e)

(g) Excess amount for set off, if any


Sl. No.	Particular	Amount (in Rs.)
(i)	Two percent of average net profit of the company as per section 135(5)	
(ii)	Total amount spent for the Financial Year	
(iii)	Excess amount spent for the financial year [(ii)-(i)]	
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous financial years, if any	
(v)	Amount available for set off in succeeding financial years [(iii)-(iv)]	

9. (a) Details of Unspent CSR amount for the preceding three financial years:

Sl. No.	Preceding Financial Year.	Amount transferred to Unspent CSR Account under section 135 (6) (in Rs.)	Amount spent in the reporting Financial Year (in Rs.).	Amount transferred to any fund specified under Schedule VII as per section 135(6), if any.			Amount remaining to be spent in succeeding financial years. (in Rs.)
				Name of the Fund	Amount (in Rs.)	Date of transfer.	
1.							
2.							
3.							
	Total						

(b) Details of CSR amount spent in the financial year for ongoing projects of the preceding financial year(s):

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(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Sl. No.	Project ID.	Name of the Project.	Financial Year in which the project was commenced.	Project duration.	Total amount allocated for the project (in Rs.).	Amount spent on the project in the reporting Financial Year (in Rs.).	Cumulative amount spent at the end of reporting Financial Year. (in Rs.)	Status of the project - Completed /Ongoing.
1								
2								
3								
	Total							

10. In case of creation or acquisition of capital asset, furnish the details relating to the asset so created or acquired through CSR spent in the financial year

(asset-wise details).

- Date of creation or acquisition of the capital asset(s).
- Amount of CSR spent for creation or acquisition of capital asset.
- Details of the entity or public authority or beneficiary under whose name such capital asset is registered, their address etc.
- Provide details of the capital asset(s) created or acquired (including complete address and location of the capital asset).

11. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per section 135(5).

Sd/- (Chief Executive Officer or Managing Director or Director).	Sd/- (Chairman CSR Committee).	Sd/- [Person specified under clause (d) of sub-section (1) of section 380 of the Act] (Wherever applicable).
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Annual Action Plan for Financial Year 2023-24

CSR PROPOSALS for 2023-2024					
Total CSR funds for 2023-2024 ₹ 1,34,45,452					
Organization	Project Title	Amount	Project Objective	Location and Duration of the Project	Projects under Schedule VII
ASHA	Life Skills Training Program and Need based Family Support Project	₹ 20,94,000	Children's education (life skills training) for 64 autistic children	Bangalore, 1 year project	Schedule 1 (ii)
HOPE SOCIETY	Hope to the Differently Abled	₹ 20,00,000	Focus on aspects related to health, education, social and livelihood development for a village Target: 1050 beneficiaries	Chikaballapur District, Karnataka 1 year project	Schedule 1 (i, ii, x)
ANAHATA UNITED EFFORTS FOUNDATION	Nurturing Aspirations Through Education (N.A.T.E)	₹ 16,00,000	Education through career exposure and guidance 1100 Students	Bangalore, 1 year project	Schedule 1 (ii)
KRIPA EDUCATION TRUST	Promoting Holistic education for children	₹ 20,00,000	Overall development of a school 315 beneficiaries	Tamil Nadu, 1 year project	Schedule 1 (i, ii)
MURALI KRISHNA TRUST	Ensuring rights of children through Residential Care and Family Strengthening Program	₹ 26,00,000	Implementation of the rights of the children in vulnerable situations totally 780 beneficiaries Direct beneficiaries 30 children residing in Mango's Home Indirect beneficiaries 250 families with 500 children	Andra Pradesh, 1 year project	Schedule 1 (i)
The NEST Charitable Trust	Woman Welfare and Livelihood Support Programme / Comprehensive Child Development Programme	₹ 15,00,000	Construction of Tailoring center which will benefit 60 Women ; 10 children will benefit through the comprehensive child development program	Tamil Nadu, 1 year project	Schedule 1 (ii, iii, x)
Funds allocated for 2023-2024 Projects ₹ 1,17,94,000					