SNL CORPORATE SOCIAL RESPONSIBILITY POLICY

Policy

SNL is committed to improving the quality of life of the people it deals with and contributing to the welfare of the communities where it operates. We believe such activities contribute economic development of the society at large and build capacity for sustainable livelihoods.

Out of the activities listed in the Schedule VII of Section 135 of the Companies Act, 2013 we have embraced the following:

Promotion of education Employment enhancing vocational skills Promoting social business projects Contribution to funds set up by Central/State Government's for social economic development and relief

In terms of the above the company has contributed to the PM Relief Fund for providing relief to the flood hit in J&K. It has also been considering suitable projects in and around Ranchi for promoting education, and employment enhancing vocational skills, which could be taken up during the succeeding financial years.

Principles

SNL's CSR Policy is supported by the following principles:

- we are committed to conducting our operations with integrity and respect, in the interest of our stakeholders and in line with our business principles.
- we believe growth and commitment to social change need not be conflicting. Our business model is designed to deliver sustainable growth. The inputs to the model are our people and our contributions in skills enhancement of these people. Making a notable impact in the rural education and providing a higher education which is liberal in its true sense helping develop intelluct, nurturing critical thinking and achieving positive social impact will be the outputs of our model.
- we believe in collaboration and engagement with government institutions, educational institutions and other not for profit organisations.

In accordance with Section 135(5) of the Companies Act, 2013 SNL is committed to spend atleast 2% of its average net profits for the last 3 years. During FY 2014-15 an amount of Rs.11.54 lacs has been contributed to the PM Relief Fund.

Governance mechanism

The Board of Directors at their meeting held on 29.1.2015 constituted the CSR Committee comprising Ms. H S Zaveri as Chairman and Mr.J D Diwan (Independent Director) and Mr.S C Rangani as Member. The terms of reference of the CSR committee in line with the requirements of section 135 of the Companies Act, 2013 and the rules framed thereunder are as below:

- 1. Formulate and recommend to the Board the CSR policy indicating the activities to be undertaken by the Company including the modalities of execution of such programmes and the implementation schedule.
- 2. Recommend the amount of expenditure to be incurred to the activities referred to above.
- 3. Monitor the implementation of the projects or activities undertaken by the Company.

The Board shall approve the CSR policy recommended by the CSR committee and decide whether to undertake these activities directly or through a registered trust or whether it would like to collaborate with other companies for undertaking the CSR activities in such manner that they are implemented in accordance with the rules. The committee shall give preference for implementing programmes in the areas around where it operates.

The details of the same are available on the Company's website.

The Committee shall monitor the policy and the programmes from time to time.

For FY 2015-16 the CSR activities with their execution modalities and implementation schedules are being finalized and shall be monitored periodically as detailed below:

Monitoring

The company shall endeavour to collect following information from its partnering organisations.

- a. audited financial statements within 90 days of the end of the relevant financial year
- b. quarterly operational/progress reports from time to time
- c. any info or circumstance which may affect or jeopardise the implementation of the activities of the partnering organisation

To ensure steady progress and proper utilisation of CSR contribution, the following mechanism may be adopted depending upon the size of the contribution and the partnering organisation.

- a. periodic field visit by persons deputed by the company
- b. review of reports received
- c. engaging external agencies to evaluate and monitor the activity

Sr.no.	SNL initiative	Schedule VII activity	Exeuction details	Target timeline
1	PM Relief Fund	Contribution to funds set up by Central/State Government's for social economic development and relief	The contribution of Rs.11.54 lacs was made on March 2015	Providing relief to the flood hit victims

Corporate Social Responsibility (CSR)

[Pursuant to clause (o) of sub-section (3) of section 134 of the Act and Rule 9 of the Companies (Corporate Social Responsibility) Rules, 2014] Annual Report on CSR activities to be included in the Board's Report.

Sr. No.	Particulars	Remark	
1	A brief outline of the Company's CSR policy, including overview of projects or programs proposed to be undertaken and a reference to the web-link to the CSR policy and projects or programs.	Promotion of education, Employment enhancing vocational skills. Promoting social business projects, Contribution to funds set up by Central/State Government's for social economic development and relief.	
2	The Composition of the CSR Committee.	 Ms. H S Zaveri – Chairman, (NE/D) Mr. J D Diwan – Member (NE/ID) Mr. S C Rangani – Member (NE/D) 	
3	Average net profit of the company for last three financial years	Rs.576.97 lacs	
4	Prescribed CSR Expenditure (two per cent of the amount as in item 3 above)	Rs. 11.54 lacs	
5	Details of CSR spent during the financial year. (a) Total amount to be spent for the financial year; (b) Amount unspent, if any; (c) Manner in which the amount spent during the financial year is detailed below.	Rs.11.54 lacs Nil	

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
S.	CSR	Sector in	Projects or	Amount	Amount spent	Cumulative	Amount
No.	project	which	programs	outlay	on the projects	expenditure	spent :
	or	the	(1) Local Area	(budget)	or programs	upto to the	Direct or
	activity	project is	or other	project or	Sub -heads:	reporting	through
	identified	covered	(2) Specify the	programs	(1) Direct	period	implemen
			state and	wise	expenditure on		ting
			district		projects or		agency*
			where		programs		
			projects or		(2) Overheads		
			programs				
			was				
			undertaken				
1	PM	Providing	National	Rs.11.54 lacs	Rs.11.54 lacs	Rs. 11.54 lacs	Directly
	RELIEF	relief to	Program of				to PM
	FUND	flood hit	PM Relief for				Relief
		J & K	flood hit J & K				Fund
	Total			Rs.11.54 lacs	Rs. 11.54 lacs	Rs.11.54 lacs	

*Give details of implementing agency.

- 6. In case the Company has failed to spend the two per cent of the average net profit of the last three financial years or any part thereof, the company shall provide the reasons for not spending the amount in its Board report. **Not Applicable**
- 7. A responsibility statement of the CSR Committee that the implementation and monitoring of CSR Policy, is in compliance with CSR objectives and Policy of the Company

SD/	SD/	Not Applicable
Mr. S C Rangani (Chief Executive Officer or Managing Director or Director)	Ms. H S Zaveri (Chairman CSR Committee)	[Person specified under clause (d) of sub-section (1) of section 380 of the Act] (wherever applicable)