

CORPORATE SOCIAL RESPONSIBILITY POLICY
OF
JMC PROJECTS (INDIA) LIMITED

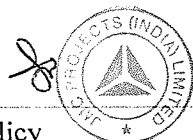
Implementation & monitoring: CSR Committee and CSR Council

Facilitation: CSR Team

Corporate Office: 6th Floor, Kalpatru Synergy, Opp. Grand Hyatt, Santacruz (East),
Mumbai 400055 India Tel: 022 30051500

Regd. Office: A-104, Shapath - 4, Opp. Karnavati Club, S. G. Road, Ahmedabad 380015
Tel: 079 30011500. CIN: L45200GJ1986PLC008717

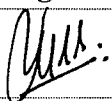
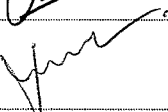
Copy Right Notice: This policy and communication in relation thereto is internal and private circulation. Because of the statutory mandate, this Policy / its contents would be published in Report / website of the Company. However it does not intends to make this Policy a public document. The copyright of this document is vested with JMC Projects (India) Limited. All rights reserved. Whole or part of this document shall not be reproduced or stored or transmitted in any form or by any means without the consent of the copyright owner. Copy of this document can be stored by associates and employees for office use and implementation purpose only. This policy originally evolved and drafted by Mr. Suresh Savaliya.

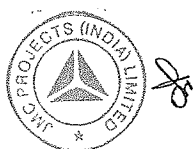


CSR POLICY
OF
JMC PROJECTS (INDIA) LIMITED

Sr.	Content	Page
1.	CSR Philosophy and Background	3
2.	Objectives	3
3.	Definitions	4
4.	Applicability and Effective Date of the Policy	6
5.	Extent of CSR Activities and CSR Programmes	6
6.	CSR Functionaries	8
7.	Implementation and Carry out of CSR Programmes	10
8.	Resources	13
9.	Monitoring, Reporting and Disclosure	14
10.	Review and Amendments in the Policy	15

Adopted by CSR Committee and Board in its respective meeting held on November 6, 2014 and authenticated on their behalf by following persons.

Name	Signature
Mr. Shailendra Kumar Tripathi CEO & Dy. Managing Director	
Mr. Manoj Tulsian CFO & Director (Finance)	



1. CSR PHILOSOPHY AND BACKGROUND

The world is facing numerous challenges ranging from poverty, malnutrition, environmental degradation, poor healthcare and global warming. The social responsibility policy focuses on using the capabilities of business to improve lives and contribute to sustainable living, through contributions to communities and society at large. Corporate social responsibility in form of statue is reflection of ancient Indian virtue “law of giving”. CSR initiatives is step towards giving back something to society for sustainable economic growth and nation building.

Companies need to take initiatives in relation to corporate social responsibility as per Companies Act 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

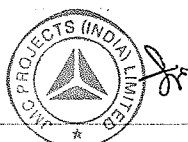
As per section 135 of the Companies Act, 2013 every company having net worth of Rs. 500 crore or more, or turnover of Rs. 1,000 crore or more or a net profit of Rs. 5 crore or more during any financial year shall a Corporate Social Responsibility Committee and shall comply relevant provisions and CSR spending pursuance of its Corporate Social Responsibility Policy.

2. OBJECTIVE

JMC Projects (India) Limited being a dominant player in the construction sector believes in giving back to the society and to honor social responsibility. The objective of this CSR policy is to lay down guiding principles for proper functioning of CSR activities towards steps for sustainable development of the society.

Objectives of this CSR Policy would include the following.

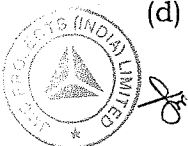
- Ensure commitment at all levels in the organisation, to operate its business in an economically, socially & environmentally sustainable manner, while recognizing the interests of all its stakeholders.
- Directly or join hands to take up programmes that benefit the communities and results, over a period of time, in enhancing the quality of life and economic well-being of the needy populace.
- To generate, through its CSR initiatives, a community goodwill for the Company and help reinforce a positive and socially responsible image of JMC as a corporate citizen.



- To contribute and efforts towards human welfare, social upliftment and economic growth with Indian philosophy of “*vasudhiva Kutumbakam*” i.e. Entire world is one family.

3. DEFINITIONS

- (a) **“Act”** means the Companies Act 2013 read with Rules including the Companies (Corporate Social Responsibility Policy) Rules, 2014 as may be clarified and amended, for the time being in force.
- (a) **“Agency”** means; group of volunteers, citizen forums, elected local body, panchayats, institute, schools, hospitals, help centers, governments, government organizations, authorities, welfare board, labour union, care centers, medical aid centers, orphan houses, social activist, *mahila mandals*, society, individual and companies; who are involved in activities of benevolent, generous, social upliftment, wellbeing and development of deprived class of peoples or activities similar to CSR Activities.
- (b) **“Board”** means Board of Directors of the Company for the time in force.
- (c) **“Company”** or **“JMC”** means “JMC Projects (India) Limited”, having CIN L45200GJ1986PLC008717 and registered office at A-104, Shapath - 4, Karnavati Club, S. G. Road, Ahmedabad 380051.
- (d) **“CSR”** means Corporate Social Responsibility as provided under the Act.
- (e) **“CSR Committee”** or **“Committee”** means “Social Responsibility Committee” of the Directors of the Company, as may be reconstituted by the Board and as may be subsist from time to time.
- (b) **“CSR Council”** means committee comprising of Chief Financial Officer, HR head, Administration Head and any other person as may be deputed by the CSR Committee.
- (c) **“CSR Policy”** or **“this Policy”** means this Policy to honor corporate social responsibility of the Company, recommended by the Committee and approved by Board of JMC Projects (India) Limited, as amended from time to time.
- (d) **“CSR Activities”** includes activities as described in this Policy, activities prescribed under the Schedule VII of the Act and/or any other

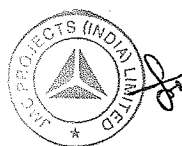


permitted activities relating to corporate social responsibility or beneficial to the society at large.

- (e) **“CSR Programme”** means programmes and/or activities undertaken by the Company in relation to CSR Activities from time to time.
- (f) **“Division”** or **“Work Center”** means every division, department and business unit of the Company viz Infra, Power, North India Operation (NIO), West India Operation (WIO), East India Operation (EIO), South India Operation (SIO), Environment, Health and Safety (EHS), Corporate Office, and Registered Office and any other department or division or project or site as may be identified as work center for the purpose of this Policy.
- (g) **“Department Head”** or **“Business Unit Head”** or **“BU Head”** means Employee of the Company who is designated as such or in charge of one or more Division, Department, Work Center or Business Units or Project.
- (f) **“JMC Social Service Team”** or **“JST”** means group of employees / volunteers who are involved in or deputed for CSR Programme.
- (g) **“NGO”** means Non-Government Organization, Charitable Trust, Foundation, institute, schools, hospitals, forum and/or other organization or persons of repute, which are doing activities of; philanthropic, benevolent, charitable and for well-being of society at large and needy class of peoples; without motive of profits and having good track record of atleast three years, and approved by the CSR Committee.
- (h) Unless the context require otherwise, words importing the singular include the plural and *vice versa* and pronouns importing a gender include each of the masculine, feminine and neuter genders and shall be interpreted in the wide sense in spirit of this Policy.

4. **APPLICABILITY AND EFFECTIVE DATE OF THE POLICY**

This CSR Policy has been developed in consonance to Section 135 of the Companies Act 2013 and Rules thereunder relating to Corporate Social Responsibility. This Policy shall apply to all CSR Programmes undertaken by the Company in India.



This CSR Policy shall apply to the Company. The Policy will be applicable to its subsidiary/ associates company, if so decided by the Board of respective subsidiary.

The CSR Committee has approved this Policy in its meeting held on November 6, 2014 and the Board has approved this Policy in its meeting held on the same day.

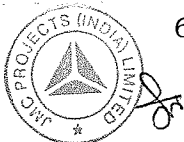
This Policy shall come in to effect from November 6, 2014.

5. EXTENT OF CSR ACTIVITIES AND CSR PROGRAMMES

5.1 Area of CSR Activities

JMC's Initiatives towards CSR and CSR Programmes would be relating to activities eligible as CSR Activities. The Company will carry out the CSR activities in the following areas in the manner as mentioned in this Policy and as circumstances permits.

1. Eradicating hunger, poverty and malnutrition, promoting 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. Providing of aids, medical help, treatment, therapies, training, appliances and other assistance to the differently-able, physically and mentally challenged persons.
2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.
3. 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.
4. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
5. 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.
6. Measures for the benefit of armed forces veterans, war widows and their dependents.



7. Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports.
8. 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.
9. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government.
10. Rural development projects.
11. Slum area development.
12. Other programmes / projects relating to the above mentioned activities and/or activities permitted as part of CSR under the Act.

5.2 **Our approach to CSR Programmes and Thrust area**

While focusing on CSR Activities, JMC intends to prefer to undertake CSR Programmes in relation to following areas.

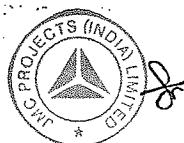
a) **Education Programmes**

Children Education Programme includes sponsor children for basic education for vulnerable sections of society, support of school fees, books, growth and development.

Scholarship Programme includes financial support for school and higher educations, technical educations and other education stream, to those students whose family are not financially capable.

b) **Employability and Training Programme** includes support in training, diploma courses, coaching, education for employment, vocational training, industrial training, skill development and other related employment oriented education and training which help needy persons especially among children, women, elderly and differently abled for their livelihood and family support and other livelihood enhancement programmes.

c) **Social Infrastructure Programme** includes renovation, construction and repair of schools buildings, libraries, welfare centres, training centers, medical centres, hospitals, reading centres, making available drinking waters, sanitations and similar initiatives.



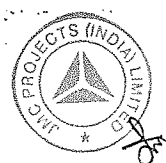
- d) **Health and Medical Programme** includes eradicating hunger, poverty and malnutrition, providing support of healthcare, medicines, medical tests, surgery, preventive health care and curative measures.
- e) **EnAble Programme** includes providing of aids, medical help, treatment, therapies, training, appliances and other assistance to the differently-able, physically and mentally challenged persons.
- f) **Environment Protection Programme** includes support to green initiatives, grow and save trees, create environmental awareness and related activities.
- g) **Rural Development Programme** includes adult education to villagers, facility of street roads, lights, clinics and other basic facilities and infrastructure to be useful for villagers and local communities.

6. CSR FUNCTIONARIES

6.1 CSR Committee

The CSR Committee shall comprise of Directors including independent Director of the Company as may be constituted and reconstituted by the Board of the Company time to time. Presently the CSR Committee comprising of three directors including one independent Director. The CSR Committee will play important and guiding role in CSR Activities. Role and terms of reference of CSR Committee include the following.

- a) To formulate and recommend to the Board, a Corporate Social Responsibility Policy.
- b) To institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the Company.
- c) Monitoring the Corporate Social Responsibility Policy of the Company.
- d) Functions as may be necessary from time to time under the Companies Act 2013.
- e) Functions as may be assigned to Committee by the Board from time to time in relation CSR activities.
- f) Consideration, review, approval and monitor CSR Programmes.
- g) Suggestions and recommendation for identification of CSR Programme.



h) Functions as mentioned in this Policy.

CSR Committee may regulate its own procedures and shall meet as and when it so decided and when the Board request.

The Committee may take assistance of HR Head and Senior Management as may be necessary in respect to implement and review of this Policy. The Committee may seek attendance of Department Heads and obtain relevant data, details and analysis as the Committee may think necessary. The Committee may also consult the experts' advice wherever they deem necessary in discharge of their duty.

6.2 **Board of Directors**

Functions of the Board relating to CSR of the Company includes approving of CSR Policy, constitute of CSR Committee, approve resources for CSR Programmes, overall monitoring of CSR Activities, statutory disclosures and reporting and others matters as mentioned in this Policy and as per applicable provision of the Act.

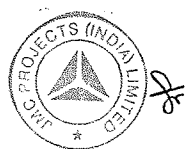
6.3 **CSR Mentor**

The Board may appoint a person of repute to act as a CSR Advisor or CSR Mentor of the Company, to advice and guide the CSR Committee and the Board in relation to CSR Programmes. CSR Advisor shall play advisory and honorary role for such terms as may be determined by the Board.

6.4 **CSR Council**

CSR Council shall comprise of Chief Financial Officer, HR head, Administration Head and any other persons as appointed by the CSR Committee. CSR Council shall perform the following functions.

- a) Identification of CSR Programmes.
- b) Review, advice and monitoring of CSR Programmes.
- c) Encourage and maintain JMC Social Service Team.
- d) Monitoring of progress and spending towards CSR Programmes.
- e) Reporting and appraising the CSR Committee
- f) Tasks and functions as mentioned in this Policy.



6.5 JMC Social Service Team (JST)

JMC Management recognizes that no pious purpose can be achieved without wholehearted human efforts. The Company intends to encourage employees, their family members and well-wishers to help the Company as volunteers towards steps in achievement and carry out of CSR Programmes. CSR Council will identify persons who are willing to work as “JST member” and involve in the JMC’s CSR Programme. CSR Committee and the Board of JMC recognize and appreciate the efforts of every JST Member.

7. IMPLEMENTATION AND CARRY OUT OF CSR PROGRAMMES

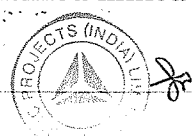
7.1 Identification of CSR Programme

CSR Activities of the Company shall be carried out as per this Policy. The Company will undertake the CSR Activities through one or more following methods as may be suitable from time to time. Identification of CSR Programme at Corporate and work center level will be done by means of the following.

- a) Suggestions from members of CSR Committee and Directors.
- b) Internal assessment and discussion with BU heads, Department Heads, Site Engineers, Local authorities, citizen’s forums, NGOs and other persons.
- c) Open discussion / solicit suggestions from employees
- d) Specific assignment, survey and assessment through JMC Social Service Team members.
- e) Interaction with the NGOs and Agencies
- f) Studies by professional institutions and Agencies
- g) Receipt of proposals or requests from NGO, Agencies, Local Body, social activists, schools, hospitals, care centers, organizations, unions, organization and persons involved in philanthropic and generous tasks.

7.2 CSR Programmes directly by the Company

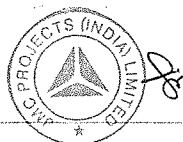
- (a) CSR Council will identify and review the proposal of CSR Programme keeping in view the location of programmes, present circumstances and needs of class of populations, prospective beneficiaries, resources requirement, programmes duration, coverage, fund requirement, connection with business of the Company, planning and other relevant aspects. CSR Council will prepare a proposal for CSR Programme and make its recommendation to the CSR Committee. Every CSR Programme should be suitably named linked with the year and area, to the extent possible.



- (b) CSR Council may consult the BU Heads to identify CSR Programme as may be suitable in the vicinity or surrounding area or region of respective construction sites or projects of the Company.
- (c) CSR Council may take help of Agencies in implementation of CSR Programmes, if necessary.
- (d) CSR Committee may consider and approve the CSR Programme with suggestion and modification, if its thinks appropriate.
- (e) CSR Programme shall be carried out as approved by the CSR Committee.
- (f) CSR Programmes will be implemented at corporate office level and also at works centres / division level, as may be decided by the CSR Committee. CSR Council shall identify the CSR Team and others persons needs to be involved and release the funds as per CSR Programme approved. CSR Council shall periodically report about the ongoing programme and on completion of the programme, shall report with its view about achievement, success, recognition and annotations.
- (g) CSR Programmes which involve considerable financial commitment may be considered as CSR Project or Flagship Programme of the Company.

7.3 **CSR Programme through NGO**

- (a) The CSR Programme which needs considerable financial commitments, sizable coverage and medium to long term time frame, may be considered for implementation through competent NGO / Agencies, including vibrant and innovative partnership. CSR Council shall make detail proposal, review the competence, legal status and background of the NGO / Agencies and recommend the same to CSR Committee with all relevant details including beneficiaries, fund requirement, resource, and responsibilities of NGO / Agency, time frame, milestone, implementation schedule, result expected, monitoring and reporting mechanism and measurable outcome.
- (b) Initiatives of NGO, Governments, Local Administration and Government Departments would be dovetailed and synergized with CSR initiatives taken by JMC in appropriate events.
- (c) Detail proposal of CSR Programme, fund involved, and scope of service from NGO / Agencies, monitoring mechanism and other relevant aspect to be placed before the CSR Committee. If the CSR Committee approves the



Programme, an agreement with the NGO / Agency shall be executed in consultation with the Legal team of the Company.

7.4 **Joint efforts for CSR Programme**

The Company may join hands with companies including holding company, subsidiary companies, and associate companies for carry out of CSR Programmes jointly.

7.5 **Contribution / donation to NGO**

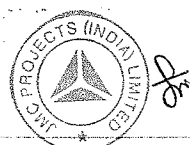
- (a) The Company may donate appropriate amount to NGO who are well established, having valid applicable registration or certificates, governed under applicable laws and having good track records of doing CSR Activities.
- (b) CSR Council will propose to the CSR Committee about donation with necessary details about the NGO as mentioned here above, end use of donations, prospective association in furtherance of CSR Activities of the Company and other relevant details.
- (c) The Company will make donation to such NGO as may be approved by the CSR Committee on case to case basis with reporting, end use, documentation etc.

7.6 **Contribution / donation to specified NGO**

The contributions made by JMC to Kalpataru Welfare Trust, and other Trust or organization approved by the CSR Committee, shall be considered as CSR Activities, as may be permitted and after complying with applicable provisions of the Act.

JMC may promote or establish one or more Trust, foundation, education institute or other form of no profit organization with objects to perform CSR Programmes / CSR Activities and other similar objects. JMC will carry out CSR Programmes through such organization and donation and contribution made to such organization shall be considered toward CSR Activities, as may be permitted as per applicable provisions of the Act or other statutory provisions.

In the aforesaid cases, the CSR Committee shall specify the CSR Activities, CSR Programmes to be undertaken through above mentioned organization, modalities of utilization of funds, monitoring and reporting mechanism.



8. RESOURCES

The Company intends to spend 2% of the average net profits of the company during the immediately preceding three financial years towards the CSR Activities or such other amount as may be recommended by CSR Committee and approved by the Board.

Amount to spend towards the CSR Programmes shall be in following manner.

- a) To afford a degree of flexibility of CSR, CSR Council can approve up to Rs. 5 lakhs in a financial year towards CSR programmes. All programmes approved by CSR Council and amount spend in term of the said delegation to be regularly brought to the information of the CSR Committee.
- b) All other expenses and fund release towards CSR Programmes, contribution, donations etc needs prior approval of the CSR Committee.
- c) Any CSR Programme requiring financial needs of more than Rs. 25 lakhs, will needs specific recommendation from CSR Committee and prior approval of the Board.

If the Board may determine, CSR Corpus will be created by allocating appropriate amounts every years as may be suggested by the CSR Committee and approved by the Board. Such CSR Corpus will be used to meet the fund requirements of CSR Programme. CSR Committee may allocate funds in such proportion as it thinks fit for long term and short terms CSR Programmes and also introduce CSR budget system in consultation with the Board and CSR Council as and when necessary.

9. MONITORING, REPORTING AND DISCLOSURE

CSR Council shall periodically review and monitor the progress and amount spends towards the CSR Programmes and brief to the CSR Committee. All the CSR Programmes, activities and other aspects of this Policy shall be reviewed and monitored by the CSR Committee periodically as the Committee thinks fit. The CSR Committee and CSR Council shall act in close coordination. CSR Committee may discuss and review about the CSR activities with JST members and may obtain suggestions for effective and smooth implementation.



Monitoring also includes field visits, comprehensive documentation and interaction with beneficiaries community. CSR Council may assign accountabilities of implementation / monitoring of CSR Programme to a member of Council, JST member or Division Head.

An annual report of the activities undertaken under the CSR initiatives shall be prepared as per statutory requirement and as may be requested by the Board from time to time. Necessary details about CSR Activities of the Company shall be disclosed in annual report of the Company.

A brief quarterly report on CSR Programmes in progress, identified, implemented, amount spend, future planning etc, shall be submitted to the Board.

The Company's advancement in the CSR segment shall be disseminated on its website, annual reports, its in-house knowledge journal and through various media.

10. REVIEW AND AMENDMENTS IN THE POLICY

The CSR Committee or the Board may review the Policy as and when it deems necessary.

The CSR Committee may issue the guidelines, procedures, formats, reporting mechanism and manual in supplement and better implementation to this Policy, if it thinks necessary.

This Policy may be amended or substituted by the CSR Committee or by the Board as circumstances warrant.

