

CORPORATE SOCIAL RESPONSIBILITY POLICY OF SECON PRIVATE LIMITED

A. Introduction

SECON founded in the year 1981, initially to provide survey and investigation services for land development now has diversified into multidiscipline, GIS driven design consultancy and investigation services for Infrastructure Projects. Allied support services include Ground Survey & Investigation, generation of data for GIS Database and Base Map Preparation, Aerial Triangulation, Generation of Ground Control Points/ Monumentations, Digital Elevation Model (DEM), Orthorectification, 3D Planimetry & Topography feature collection by Photogrammetric Mapping, 2D Data Compilations, Ground Validations, LiDAR and Remote Sensing & Satellite Image Processing.

SECON has always been committed to all its stakeholders to conduct business in an economically, socially and environmentally sustainable manner that is transparent and ethical. Our commitments include, but are not limited to, education, health and safety, energy, betterment of the society through respect for universal human rights and environment, acting with integrity and accountability and operating responsibly and sustainably.

With the advent of the Companies Act, 2013 constitution of a Corporate Social Responsibility Committee of the Board and formulation of a Corporate Social Responsibility Policy became a mandatory requirement. Therefore, the Company seeks to formulate a robust CSR Policy which encompasses its philosophy and guides its sustained efforts for undertaking and supporting socially useful programs for the welfare & sustainable development of the society.

B. CSR Objective

SECON through its CSR initiatives will continue to enhance value creation in the society and in the community in which it operates, through its services, conduct and initiatives, so as to promote sustained growth for the society and community, in fulfilment of its role as a Socially Responsible Corporate, with environmental concern.

The objective of the SECON CSR Policy is

- To ensure an increased commitment at all levels in the organization, to operate its business in an economically, socially & environmentally sustainable manner, while recognizing the interests of all its stakeholders;
- To take initiatives, directly or in association with other organizations, and organizing programs that benefits the communities, in and around its areas of operations, over a period of time, in terms of enhancing the quality of life and economic well being of local general public.
- To generate, through its CSR initiatives, community goodwill for SECON and help reinforce a positive & socially responsible image of SECON as a corporate entity.

C. CSR Activities / Thrust Areas

The scope of the CSR activities of the Company will cover the following areas but not limited to the same and may extend to other specific projects/ programs as permitted under the law from time to time.

Sr. No.	Area	Activities/Initiatives/Programs
1a.	Eradicating hunger, poverty and malnutrition	Agro Based livelihoods, Better Cotton Initiatives, Agriculture Development, Krishi Vigyan Kendra.
1b.	Promoting health care including preventive healthcare and sanitation	Health and Sanitation Development programs, medical camps, programs for HIV Aids etc.

1c.	Providing safe drinking water	Drinking water programs, construction of check dams, dykes, ponds, links, channels, wells and water storage tanks.
2	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;	Construction and running of schools and libraries, vocational training and special education institutes, providing financial assistance and scholarships for higher education. Undertaking and skills and entrepreneurship programs.
3	Women Empowerment and Facilities for Senior Citizens	Setting up centres and institutions for women & senior citizenship. Promoting SHGs amongst women for undertaking income generating activities.
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;	Horticulture plantation, agro farm forestry, afforestation, projects on non-conventional energy (biogas), animal husbandry programs, forest conservation projects, water resource management and soil conservation, promoting micro-irrigation etc.
5	Promotion and protection of art & culture	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;	Activities/programs for benefit of armed forces and families.
7	Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;	Projects/programs promoting various sports activities
8	Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;	Projects/programs for the development and upgrading of technology
9	Contribution/Financial Assistance	Contribution to 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;
10	Rural development projects	Rural infrastructure projects and agriculture development programs and projects.

D. Exclusion from CSR

The following activity shall not form part of the CSR activities of the Company:-

1. The activities undertaken in pursuance of normal course of business of a company.
2. CSR projects/programs or activities that benefit only the employees of the Company and their families.
3. Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes.
4. Any CSR projects/programs or activities undertaken outside India.

E. CSR Committee

CSR Committee shall be formed as per the applicable laws and the committee shall be responsible for the implementation/monitoring and review of this policy and various projects/activities undertaken under the policy. The CSR Committee shall submit periodical reports to the board of directors.

F. CSR Budget /CSR Spend

The Company shall endeavour to spend at least 2% of the average net profit during the preceding 3 financial years or as mandated by the Company Act on CSR activities as enumerated above.

The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by the Board of Directors on the recommendation of its CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII of the Act.

In case the Company fails to spend the above targeted amount in that particular financial year, the Committee shall submit a report in writing to the Board specifying the reasons for not spending the amount which in turn shall be reported by the Board of Directors in their Director's Report for that particular Financial Year.

Any surplus arising out of the contribution made for CSR Activities shall not form part of the business profit of the Company and redeployed for such activities.

G. Identification & Implementation of CSR Projects

- CSR Projects need to be identified and planned for approval of the Board by CSR Committee, in particular in Thrust Areas, with estimated expenditure and phase wise implementation schedules.
- The time period / duration over which a particular program will be spread, will depend upon its nature, extent of coverage and the intended impact of the program.
- By and large, it may be ensured that the CSR activities are executed in and around the areas adjoining SECON's area of operations (including its Branches / Project offices).
- Project activities identified under CSR may be implemented by the Company itself or through specialized agencies, which could include –voluntary organizations, formal or informal elected local bodies such as Panchayats, Institutes / academic Institutions, Trusts, Self Help Groups, Govt /Semi Govt / organizations, Professional Consultancy organisation , etc
- The Company may collaborate with other companies, including its subsidiary Companies and Group Companies if required, for fulfilling its CSR objects provided that the CSR Committees of respective companies are in a position to monitor separately such Projects.
- Identification of Programs at Corporate level will be done by means of the following:
 - Need identification studies by professional institutions / agencies;
 - Internal need assessment by cross functional team at local level;
 - Receipt of proposals / requests from district administration/ local govt. etc
 - Discussion and request with local representatives / civic bodies / citizen's forum / voluntary organization.

H. Monitoring & Reporting

Monitoring process for CSR Projects shall include the following:

- i. Evaluation of Planned progress V/s Actual Progress
- ii. Actual expenditure V/s expenditure as per Approved Budget

The CSR Committee will be responsible for the monitoring of CSR activities and report to the Board from time to time in the prescribed format. The format of the Report shall be the format prescribed under the CSR Rules stated hereunder:

Sl. No	CSR Project or Activity Identified	Sector which the project is covered	Project or Programs 1) Local Areas, 2) Specify the state and district where projects or programs was undertaken	Budget (Project or Program)	Amount spent on Project or program	Cumulative Expenditure	Amount Spent Direct or through Agency	Target Date & Status
					a) Direct Expenditure			
					b) Overheads			

I. Review and Amendment

The CSR Policy of the company may be revised/modified/amended by the Board of the company on the recommendation of the CSR Committee at such intervals as it may deem fit.

J. Disclosures

The annual report of the Company shall include a section on CSR outlining the CSR Policy, CSR committee, CSR initiatives undertaken by Company, the CSR spend during financial year and other information as required by the prevailing law.

Authorized Signatory