

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 business 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 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, 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 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. 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.

The company is focusing on developing old age home for senior citizen through the trust Shakuntalam Welfare Trust , until the project will start the company will focus to promote quality education through implenting agencies.

2. 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.

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 practicing 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 recognized sports, Paralympic sports and Olympic sports.

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

ADMINISTRAION

Where the amount to be spent by a company does not exceed fifty lakh rupees, the requirement for constitution of the Corporate Social Responsibility Committee shall not be applicable and the functions of such Committee provided under this section shall, in such cases, be discharged by the Board of Directors of such company.

Thus , All the functions as provided under the section 135 Companies Act, 2013 and rules made there under will be discharge by the board of Director of the company.

ROLES AND RESPONSIBILITY

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*
- *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*
- *Recommending the CSR policy in compliance with Section 135 of the Companies Act 2013*
- *Identifying and recommending CSR activities and budget.*
- *Instituting a transparent monitoring mechanism for implementation of the CSR projects and interventions undertaken by the Company*
- *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 other internal and external stakeholders as may be required.*

Budget Allocation

- *For achieving its CSR objective, 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 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 AND REPORTING

Periodic Monitoring & Reporting

To ensure effective implementation of the FSL CSR interventions, a structured monitoring mechanism will be put in place by the board.

- *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.*

ANNUAL REVIEW

The Board will prepare a yearly report of all CSR projects and/or interventions, with or without external support.

DOCUMENTATION & DISSEMINATION

The Board 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 Board 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 board 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.*

For Frontline Securities Ltd.


Rakesh K Jain

Director

DIN: 0005052

Director

By Order of the Board of Directors
For Frontline Securities Limited
For Frontline Securities Ltd.


Atul Kumar Jain **Director**

Director

DIN: 00133750