



Corporate Social Responsibility

Policy & Procedure Manual

Effective Date: 3rd October 2017

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1. CONTEXT

Pole to Win ('**the Company**') has been adopting the Corporate Social Responsibility ('**CSR**') initiatives. Along with sustained economic performance, environmental and social stewardship is also a key factor for holistic business growth. Pole To Win works towards removing malnutrition, improving healthcare infrastructure, supporting primary education, rehabilitating abandoned women and children, and preserving Indian art and culture. Pole To Win partners with non-government organizations (NGOs) to make a difference among local communities. 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.

2. OBJECTIVES

PTW CSR Policy intends to:

Strive for economic development that positively impacts the society at large with minimal resource footprint.

Embrace responsibility for the Company's actions and encourage a positive impact through its activities on hunger, poverty, malnutrition, environment, communities, stakeholders and the society.

3. FOCUS AREAS

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

- **HUNGER, POVERTY, MALNUTRITION AND HEALTH:** Eradicating extreme hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.
- **EDUCATION:** Promoting education, including special education and employment-enhancing vocational skills especially among children, women, elderly and the differently abled, and livelihood enhancement projects; monetary contributions to academic institutions for establishing endowment funds, chairs, laboratories, etc., with the objective of assisting students in their studies.
- **RURAL DEVELOPMENT PROJECTS:** Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.
- **GENDER EQUALITY AND EMPOWERMENT OF WOMEN:** Promoting gender equality and empowering women; setting up homes, hostels and day care centres for women and orphans; setting up old age homes and such other facilities for senior citizens; and adopting measures for reducing inequalities faced by socially and economically backward groups.

4. UNDERTAKING CSR ACTIVITIES

Pole To Win will undertake its CSR activities, approved by the CSR Committee, through the India entity/organization as approved by the CSR Committee.

The surplus arising out of the CSR activities, projects or programs shall not form part of the business profit of the Company

5. LOCATION OF CSR EFFORTS

The CSR committee will decide on the locations for CSR activities.

6. GOALS

Our goals include the following:

Sl. No.	Goal area	Actions
1	Hunger, Poverty, Malnutrition and Healthcare	PTW will work with various non-profit organizations that run mid-day meal programs in schools across India and may establish kitchens that provide meals to schoolchildren. PTW will work with organizations working in medical or health-related projects such as providing support for cancer treatment, cataract surgeries, etc.
2	Education	PTW's focus on Education will be on two fronts: (a) To train students from under privileged backgrounds in its various development centers. (b) Provide grants to various schools / colleges in India for improving their infrastructure. Sponsor chairs and create endowment funds for the colleges/universities to assist students with their studies.
3	Gender Equality and Empowerment of Women	PTW's focus on Gender Equality and Empowerment of Women will be on two fronts: (a) To end discrimination against women and girls (b) To end all violence against and exploitation of women and girls

7. COMPOSITION OF CSR COMMITTEE

The CSR Committee shall consist of the following Directors:

- a. Sijo Jose
- b. Sree Raghavendra

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8. RESPONSIBILITIES OF THE COMMITTEE

The responsibilities of the CSR Committee include:

- Formulating and recommending to the Board of Directors the CSR Policy and indicating activities to be undertaken,
- Recommending the amount of expenditure for the CSR activities, and
- Monitoring CSR activities from time to time

9. GOVERNANCE

The Company through a registered trust or a registered society can undertake CSR activities as per the provisions of the Companies Act, 2013. Accordingly, PTW team will work closely with and support the Board and the CSR Committee in implementing CSR activities of the Company. PTW team will assist the CSR Committee in identifying the areas of CSR activities, programs and execution of initiatives as per defined guidelines. PTW team will also assist the Board and the CSR Committee in reporting the progress of deployed initiatives and in making appropriate disclosures (internal/external) on a periodic basis.

10. FUNDING, SELECTION AND MONITORING PROCESS

PTW entity will receive requests for funding of projects throughout the calendar year. Its panel of experts will evaluate proposals received under the CSR and will focus areas and projects will be prioritized by assessing their impact. The CSR Committee will deliberate on the proposals and approve proposals for implementation at its discretion.

PTW representatives or such other entity will collaborate with stakeholders to monitor the status of each project and will report its findings to the CSR Committee periodically.

11. EFFECTIVE DATE

This policy is effective from 3rd October 2017.

12. CONTACT

For queries related to the CSR Policy, please write to us at: csr-india@ptw-i.com

CSR Policy Revision History					
Sl No.	Ver No.	Effective Date	Issued By	Proposed By	Reviewed & Approved By
1	1.0	3 rd October 2017	Sree Raghavendra (Director Finance)	Sree Raghavendra (Director Finance)	Daisuke Otani (BOD) Sumanth Nag (BOD)
2	1.1	6 th September 2018	Vijay Montherio (Manager Finance)	Vijay Montherio (Manager Finance)	Sijo Jose (BOD) Sree Raghavendra (BOD)

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