



Fineline India ID Solutions Pvt LTD. Corporate Social Responsibility Policy

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1. Preamble

Fineline always believes in a culture driven by ethics and fundamental values of integrity. The Corporate Social Responsibility Policy (hereinafter referred to as CSR Policy) of Fineline has been framed in consonance with Section 135 of the Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules, 2014 notified by the Ministry of Corporate Affairs, Government of India. This policy henceforth called “Fineline Policy”, underlines the guiding principles and mechanisms of undertaking CSR Programs by Fineline as per Schedule VII of the Companies Act, 2013.

2. Philosophy & Vision

Fineline recognizes the very fact that a business organization is an economic organ of society and hence should be upholding the principle of the Triple Bottom Line. Considering the aforementioned philosophy, Fineline’s CSR Vision is **“To always carry itself as a Responsible Corporate Citizen by contributing to Girl Child Education while discharging economic responsibility”**.

3. Objective

- To define what CSR means to Fineline.
- To lay down the guidelines and mechanisms to carry out CSR programs and the standard operating procedures to be followed for this purpose.
- Align and synchronize the CSR activities undertaken by Fineline in accordance to the applicable laws.
- Engaging with Finelines’s key stakeholders.

4. Validity & Amendment

The Fineline CSR Policy will come into force with immediate effect after being approved by the Board. The Board of Directors and /or the CSR Committee reserves the right to alter/amend/update the Fineline CSR Policy from time to time as per need or as deemed fit to ensure that the policy meets the regulatory requirements. In case of any difference between the policy and the regulatory requirements, the latter shall be in force.

5. CSR program(s) to be undertaken

CSR program(s) that Fineline decides to undertake will be ascertained depending on the community and business needs of Fineline and will be chosen from the entries and items mentioned under Schedule VII of the Companies Act, 2013 (the latest amendments also to be referred to).

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6. Budget & Expenditure

The CSR budget allocated for CSR activities in each financial year will be at least 2% of the average net profits made by Fineline in the immediately preceding three financial years calculated as per Section 198 of the Companies Act, 2013.

CSR expenditure will include all expenditures including contributions to the corpus for programs or projects relating the CSR activities approved by the Board and as recommended by the CSR committee. Moreover, any surplus arising out of any CSR activity will also have to be utilized for any CSR activity.

7. Organization Mechanism

7-a) CSR Committee & Governance

The CSR Committee of Fineline :

Sl. No.	Name of the Committee Member	Designation	Role in CSR Committee
1	Mr. Avinash Kumar	Country Operation Manager	Chairman of Committee
2	Mr. Kailasaraman Meenakshi Sundaram	Chief Operations Officer	Member of Committee

The CSR Committee shall

- Formulate and recommend a CSR policy to the board, indicating the activities as specified in Schedule VII of the Act
- Recommend the amount of expenditure to be incurred on the activities indicated in the policy
- Monitor the CSR policy regularly

Fineline has constituted a robust governance mechanism to ensure that CSR policy is implemented as per plan and in accordance to Section 135 of The Companies Act, 2013. The Board level CSR committee as mentioned above will be responsible for the governance of all CSR interventions undertaken by Fineline. The committee will meet in time gaps as felt appropriate to review the work and progress of CSR activities. The Committee shall submit its report to the Board at the end of every financial year.

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7-b) CSR Strategy

The CSR strategy refers to what Fineline expects to achieve in the next three to five years and entails how Fineline plans to achieve these in terms of organization and approach. The Fineline CSR strategy will articulate

- who it wishes to address i.e. the target group/beneficiaries
- where it wishes to work i.e. the geography
- what sectors or issues it wishes to address in line with Schedule VII of the Act

7-c) Implementation Mechanism

In order to gain the greatest leverage and strategic advantage in terms of the implementation of CSR projects, the company will adopt executing CSR activities through:

- an in-house CSR department
- in collaboration/partnership with an implementation partner/ agency (which has a track record of at least three years and is primarily an NGO which is a registered Trust or a Society or a Section 8 Company)

While determining to work with an implementation partner/agency, Fineline will do Due Diligence of the implementing agency before the partnership.

7-d) Project Development

The CSR strategy of Fineline will be implemented through projects which may be of short duration (few months) or multi-year. A typical project proposal will include key needs of target groups, project goals, KPIs, baselines, expected end line, activities and timelines, budgets with estimation basis, risks & mitigation strategies, progress reporting content & frequency.

7-e) Project Approval

Every project whether developed in-house or by an external agency will be formally examined and approved by the CSR committee

7-f) Project Monitoring & Evaluation

Routine monitoring and evaluation of the project will be undertaken to ensure objectivity. The progress of a project will be taken in the form of a report to note the gaps and take corrective actions. One or more of the following tools may be used for the monitoring and evaluation of a project- Result Based Management, Logical Framework Analysis, Outcome Mapping, Participatory Learning & Action, Most Significant Change, Citizen Report Card, Community Score Card, and Citizen Monitoring.

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7-g) Impact Measurement

The impact of a CSR project is the ultimate success factor. The impact of any project may be immediate or may take some time. Since impact and its measurement is a specialized factor, it will be better to be undertaken by a separate agency with specific skills. As such, Fineline may engage an external agency for impact assessment.

7-h) Report Consolidation & Communication

Reporting and communication of CSR intervention close the loop between intent and achievement. In the context of The Companies Act, 2013 it is also a mandatory requirement as it provides crucial inputs to preparing the Directors' report. Reporting the CSR can be done at an individual project level, consolidated at a program level and aligned with the requirements under the Companies Act, 2013 and the CSR Committee.

The Board's report under the CSR rules pertaining to a financial year shall include an Annual Report on CSR containing particulars as mentioned in Annexure

The Board of Directors after taking into the recommendation of the CSR committee approve the CSR policy for Fineline and disclose the contents of the policy in its report.

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ANNEXURE

The manner in which the amount spent during the financial year to be detailed as mentioned below

1	2	3	4	5	6	7	8
Sl. No.	CSR Project or Activity Identified	Sector in which the project is covered	Projects or Programs (1)Local area or others (2) Specify the State & District where the Projects or Programs were undertaken	Amount outlay (budget) project or program wise	Amount spent on the projects or programs Sub-heads (1)Direct expenditure on project or program (2)Overheads	Cumulative Expenditure upto the reporting period	Amount spend: Direct or through Implementing Agency*
1							
2							
3							
	Total						

*Give details of Implementing Agency

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Format 1

The following format will be used in project implementation & budgeting CSR Project

Name of CSR Project				
Description				
Location				
Duration				
Total Budget		Type of expenditure	Amount	
		Total expenditure		
Expected Project Outputs				
Implementation Schedule	Activity	Start Time	End time	Remarks
	Activity 1			
	Activity 2			
	Activity 3			

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