



SenecaGlobal IT Services Private Limited

**Corporate Social Responsibility  
Policy**

(CSR Policy)



# SenecaGlobal CSR Policy

## TABLE OF CONTENTS

1. INTRODUCTION .....	3
2. OBJECTIVE AND PURPOSE .....	3
3. ALIGNMENT WITH SENECAGLOBAL VALUES .....	3
4. SCOPE OF CSR POLICY.....	4
5. CSR FOCUS AREAS .....	4
7. IMPLEMENTATION AND UNDERTAKING CSR ACTIVITIES .....	6
8. MEETINGS OF THE CSR COMMITTEE .....	6
9. CSR BUDGET AND FUNDING .....	6
10. COMPLIANCE MONITORING AND REPORTING.....	7
11. AMENDMENTS TO THE POLICY .....	8



## 1. Introduction

Corporate Social Responsibility (CSR) has always been looked upon as an act of charity or doing something good for the society or public at large. CSR is not a new concept in India, however, for the first time in 2014 the CSR activities were brought under the Corporate regulations and has cast a mandatory responsibility on the Corporates to contribute towards social causes. The guiding principles as per the Draft Corporate Social Responsibility (CSR) Rules under Section 135 of the Companies Act, 2013 (“Act”) specify that CSR activities are not charity or donation but a *“way of conducting business by which corporate entities visibly contribute to the social good. Socially responsible companies do not limit themselves to using resources to engage in activities that increase only their profits. They use CSR to integrate economic, environmental and social objectives with the company’s operations and growth”*. As mentioned by United Nations Industrial Development Organization (UNIDO), CSR is generally understood as being the way through which a company achieves a balance of economic, environmental and social imperatives (“Triple- Bottom-Line- Approach”), while at the same time addressing the expectations of shareholders and stakeholders.

## 2. Objective and Purpose

The main objective of the CSR Policy is to lay down principles and guidelines for SenecaGlobal IT Services Private Limited (hereinafter referred to as ‘the Company’ or ‘SenecaGlobal’) to make CSR as one of the key focus areas to adhere to SenecaGlobal’s interest in making a positive contribution to society through effective and sustainable development programs. Below are the key purposes of this policy:-

- Outline the development areas in which the Company shall get involved in.
- Define governance structure for CSR management within the Company.
- Serve as a guiding document aiding in identification, execution and monitoring the CSR projects.

This Policy will cover the proposed CSR activities to be undertaken by the Company and ensuring that they are in line with Schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only and includes strategy that defines plans for future CSR activities.

## 3. Alignment with SenecaGlobal Values

SenecaGlobal believes social contribution is a moral obligation of all individuals and institutions. We aim to involve our employees in contributions to improve the quality of life for our underprivileged communities through integrated and sustainable development. In turn, this creates a platform for finding meaning in life outside the workplace and gaining a sense of self-accomplishment and motivation in areas leveraging our inherent core competencies.



SenecaGlobal supports and participates in philanthropic activities and works with non-governmental organizations (NGOs) in various areas including literacy, and community development including women empowerment.

#### 4. Scope of CSR Policy

This Policy applies to all CSR projects that will be undertaken by SenecaGlobal and shall fulfill all the requirements of Section 135 of the Companies Act, 2013. SenecaGlobal shall ensure all these activities are over and above the normal course of business and are in line with Schedule VII of the Companies Act, 2013. This Policy will be periodically reviewed and updated in line with the relevant codes of legislation and best practices that can be adopted by SenecaGlobal.

#### 5. CSR Focus Areas

SenecaGlobal has broadly selected below areas of focus under its CSR umbrella, as stated hereunder:

##### a) Primary Focus Areas

- i) Promote Education  
Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects, through use of information technology.
- ii) Promote gender equality and support socially and economically backward groups  
Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups
- iii) Contribution and funding to Technology Incubators  
Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government

##### b) Other Areas

- i) Contribution to the Prime Minister's National Relief Fund or PM CARES Fund any other fund set up by the central government for socio-economic development and relief and welfare of Scheduled Castes, Scheduled Tribes, other backward classes, minorities and women
- ii) Disaster management, including relief, rehabilitation and reconstruction activities
- iii) Any other areas permissible under CSR Rules.



The Act provides that the Company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR. The Company will thus give preference to conducting CSR activities in the state of Telangana wherein the Company has its operations. However, the Committee may identify such areas other than stated above, as it may deem fit, and recommend it to the Board for undertaking CSR activities.

## 6. CSR Committee and CSR Team

Pursuant to the provisions of Section 135 of the Act, the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The Members of CSR shall be appointed by the Board of Directors of the Company which must consist of at least two or more Directors. Further the Board shall form a Core CSR Committee (hereinafter called “Core committee”) Accordingly, the constitution of CSR Committee formed by SenecaGlobal is as follows:

Sl.	Name of the member	Designation in committee	Designation in Company
<b>Board CSR Committee</b>			
1.	Mr. Rao Tummalapalli	Chairperson	Managing Director
2.	Mr. Swaminathan Mani	Member	Whole Time Director
<b>Core CSR Committee</b>			
1.	Mr. Sarma Manthravadi	Member	Sr. Vice President - Operations
2.	Mr. Abhishek Chandak	Member	Vice President - Finance & Compliance
3.	Mr. Raja Nama	Member	Associate Vice President - Delivery
4.	Mrs. Anupama Panduru	Member	Manager - Culture, Learning & Development
5.	Mrs. Srivisali Nandanavanam	Member	Manager - Admin & Procurement
6.	Mrs. Sripradha Gulla	Member	Senior Executive - Corporate

The Core Committee will work under the broad guidelines and direction of the Board CSR committee. A CSR team shall be formed among the employees of SenecaGlobal, for implementing the CSR Policy and will be mainly responsible for:

- Execution of CSR Policy.
- Identify projects, key initiatives and recommend to Core committee for consideration.



- Effective implementation and monitoring of the projects approved by the CSR Committee and appraise the same to CSR Committee.

The Core committee shall submit a report to the Board CSR Committee at least once in six months on the progress of the various projects approved by the Committee and entrusted to the team for implementation and monitoring.

## **7. Implementation and Undertaking CSR activities**

The implementation of the CSR programs will happen either by way of SenecaGlobal undertaking the activities directly or through some implementation agencies or NGOs or in collaboration with other companies working on CSR. Decisions in this regard will be based on what is most appropriate and will be taken by the Board CSR Committee. Our implementation approach will be to primarily work through, NGOs, implementation agencies and partners with established track records in the respective domains.

## **8. Meetings of the CSR committee**

For smooth functioning of the Committee, the members shall meet as below to discuss such matters and to take such decisions as may be necessary:-

- a) The CSR Committee shall hold a minimum number of four meetings every year in such a manner that not more than one hundred and twenty days shall intervene between two consecutive meetings of the Committee.
- b) The members of the Committee may mutually agree between them regarding time and place for the said meetings.
- c) The quorum for the CSR Committee Meeting shall be one-third of its total strength (any fraction contained in that one-third be rounded off as one) or two members, whichever is higher.
- d) The Members of the Committee may participate in the meeting either in person or through video conferencing or other audio visual means as may be convenient.

## **9. CSR Budget and Funding**

The total budget for the CSR projects in each financial year will be decided by the Board CSR Committee in accordance with applicable provisions of the Act and the CSR Rules. The CSR Committee shall propose to distribute the budget among the Primary Focus Areas or such of them as the CSR Committee may deem fit in each financial year, in such proportion and in a manner that meets the objectives of the CSR Policy.

The budget amount and the distribution of the amount to various projects and activities will be approved by the Board CSR Committee.



If the CSR team is not able to follow the allocation agreed on in any of the Primary Focus Areas described above, the same shall be utilized in such other Areas as the Core CSR committee may recommend with the reasons therefor, and the CSR Committee may approve.

## 10. Compliance Monitoring and Reporting

### i) **Compliance:**

The Core committee and the CSR Team will plan, implement, monitor and manage all CSR projects & activities for SenecaGlobal working closely with the Board. The CSR Team will formulate implementation plans for the projects specifying the following:

- Activities to be undertaken.
- Mode of implementation, either directly or working with NGOs or implementation agencies.
- Time frame for implementation and monetary spend.
- Responsibilities and authorities for implementation.
- Results expected to be achieved post implementation.

### ii) **Monitoring:**

The CSR Committee will monitor the implementation and progress of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports etc. Mechanisms to track data and monitor projects will be established to ensure the transparency and efficiency of the implementation process. The projects will be evaluated against the milestones defined in the implementation plan of the project.

Wherever, the projects have been undertaken or entrusted with an NGO partner or an implementation agency, such NGO or agency will submit a formal report in writing on a quarterly basis on the progress of the project.

### iii) **Reporting:**

The CSR Core committee shall prepare reports that are required to be placed before the Board. In addition to other reports indicating the progress of the projects, the format of the Report shall be the format prescribed under the Companies Act, CSR Rules as stated below:



Sr. no.	CSR activity project/ activity identified	Sector in which the project is covered	Projects/ programmes (1), local area (2), separate state/district	Amount of outlay: Project/ programme-wise	Cumulative expenditure of Reporting	Amount spent: Direct or through implementing agency
1						
2						
....						
	Total					

If the Company fails to spend the required amount in a particular financial year, it will be carried forward to the next financial year i.e. the CSR budget will not lapse. The Core Committee will submit a report to the Board of Directors specifying the reasons for not spending the amount, which in turn shall be reported by the Board of Directors in their Annual Report pertaining to that particular financial Year.

#### 11. Amendments to the policy

The Board of Directors on its own and/or on the recommendation of CSR committee can amend its policy as and when required and deemed fit. Any or all provisions of CSR Policy would be subjected to revision/amendment in accordance with the applicable regulations as may be issued from relevant statutory authorities, from time to time.