

SOCIETE GENERALE INDIA



CORPORATE SOCIAL RESPONSIBILITY POLICY

General Information

Title	CSR Policy
Executive Summary	The Policy is a charter to establish the governance and functioning of the SG entities in Mumbai towards CSR.
Scope	
Geographical	All SG entities in India excluding joint ventures and SG GSC
Functional	All Staff

Roles and Responsibilities

Issuing Department	CSR	
Effective Date	August 7, 2020	
	Name	Department
Sponsor	Antoine Castel	Chief Executive Officer and Chief Country Officer of Societe Generale India
	Sujit Kadakia	Head of SGSIPL
Stakeholders	CSR Apex Committee	
	CSR Operations Committee	

Related Normative Documentation

Document Type	Title	Owner
Directive	SG Code (Book B Title VIII – Chapter 6 Section 5)	COMM + CPLE
	Sponsorship and Patronage Procedure	COMM + CPLE

Sign-Off

Name	Department
Antoine Castel	Chief Executive Officer and Chief Country Officer of Societe Generale India
Ashok Krishnamoorthy	Chief Operating Officer and Chief Financial Officer Societe Generale Bank
Sujit Kadakia	Head of SGSIPL
Mona Shah	Deputy Chief Financial Officer Societe Generale Bank
Veena Iyer	Head of Human Resources
Michael De Witte	Director, Structured Finance and Coverage for Utilities and Infrastructure
Mitul Brahmhatt	Vice President, Sales Trading
Vanessa Pinto	Senior Manager, Communications and CSR

CORPORATE SOCIAL RESPONSIBILITY POLICY

The purpose of Corporate Social Responsibility Policy of Societe Generale India is to contribute to the Company's strategy by promoting and nurturing its values: Team spirit, Commitment, Responsibility, and Innovation.

It will provide guidance relating to Corporate Social Responsibility in ensuring that the Company operates on a consistent and compliant basis.

In line with provisions of Indian Companies Act and the Group's strategy, the company has defined a Corporate Social Responsibility Policy document to implement the CSR activities.

MAINTENANCE OF THE POLICY

The CSR Policy will be maintained by SG's CSR Committee. Further, the policy will be reviewed as may be required due to a change to law or Patronage guidelines in the SG Code or atleast once every two years and updated as required, by the CSR Apex Committee.

TABLE OF CONTENTS

Societe Generale Group

Introduction.....	5
SG Code.....	5
CSR at the heart of our strategy	5
Citizenship Commitment	6
Patronage Procedure.....	7

Societe Generale India

Introduction.....	8
Indian Companies Act	8
Focus Areas	8

CSR Governance Structure

CSR Apex Committee	11
CSR Operations Committee	12
Entity Level CSR Committee	13

CSR Framework

CSR Annual Budget Allocation.....	14
Process of identification, selection and on-boarding of NGO Partners.....	14
Reporting of CSR Activities	16
CSR Leave for employees	17
Contact Information.....	18

Annexures

SOCIETE GENERALE GROUP

INTRODUCTION

Societe Generale is one of the leading European financial services groups. Based on a diversified and integrated banking model, the Group combines financial strength and proven expertise in innovation with a strategy of sustainable growth, aiming to be the trusted partner for its clients, committed to the positive transformations of society and the economy.

Active in the real economy for over 150 years, with a solid position in Europe and connected to the rest of the world, Societe Generale has over 149,000 members of staff in 67 countries and supports on a daily basis 31 million individual clients, businesses and institutional investors around the world by offering a wide range of advisory services and tailored financial solutions. The Group's mission is to empower each and everyone who wants to have a positive impact on the future.

The Group is built on three complementary core businesses:

- **French Retail Banking** which encompasses the Societe Generale, Crédit du Nord and Boursorama brands. Each offers a full range of financial services with omnichannel products at the cutting edge of digital innovation;
- **International Retail Banking, Insurance and Financial Services to Corporates**, with networks in Africa, Russia, Central and Eastern Europe and specialised businesses that are leaders in their markets;
- **Global Banking and Investor Solutions**, which offers recognised expertise, key international locations and integrated solutions.

As one of the principal European financial services groups, we fully assume our role as bankers: giving all our customers the means to have a positive impact on the future.

SG CODE

The Group's organisation and operating procedures are guided by the following principles:

- the dual priorities of quality of service and added value for clients;
- risk management and value creation for shareholders;
- respect for our employees and all stakeholders;
- conformity with all compliance and internal control
- rules applicable to the banking sector.

The SG code formalises general principals within a 500-page document including partnership (Patronage) guidelines in the [*SG CODE : Book B > Title VIII > Chapter 6](#)

CORPORATE SOCIAL RESPONSIBILITY AT THE HEART OF OUR STRATEGY

In 2017, Societe Generale presented its strategic plan for 2020, Transform to Grow, which set out a Corporate Social Responsibility (CSR) ambition to contribute to sustainable development goals. With its geographic footprint, in all countries in which it operates, through the diversity of its

businesses and by its commitment as a responsible bank, Societe Generale is helping to meet the UN's Sustainable Development Goals (SDG). The aim of this CSR ambition is to create added value for stakeholders and support positive societal transformation, including with regard to energy transition and sustainable cities, by offering sustainable products and services whilst prioritizing customer satisfaction.

Societe Generale is one of the first French banks to outline its commitment to sustainable development both in France and around the world. Societe Generale conducts its business with the utmost respect for the values and principles under:

- the Universal Declaration of Human Rights and its additional commitments;
- the fundamental conventions of the International Labor Organization (ILO);
- the UNESCO World Heritage Convention;
- the Guidelines for Multinational Enterprises of the OECD (Organization for Economic Co-operation and Development);
- the United Nations Guiding Principles on Business and Human Rights

Societe Generale is included in the main socially responsible investment indices: DJSI (World and Europe), FTSE4Good (Global and Europe), Euronext Vigeo (Europe, Eurozone and France), ESI Excellence (Europe) from Ethibel and 4 of the STOXX ESG Leaders indices.

RobecoSAM's annual sustainability ranking puts Societe Generale in 1st place worldwide on environmental matters and 6th place in Europe for all ESG (Environmental, Social and Governance) factors, out of the 175 banks analyzed.

These results are proof of Societe Generale's determination to incorporate CSR into its Group strategy to make a positive contribution in meeting social and environmental challenges.

CITIZENSHIP COMMITMENT

The purpose of the citizen commitment programme is to contribute to the Group's strategy by promoting and nurturing the following values: Commitment, Responsibility, Team spirit and Innovation.

- Through the Societe Generale Corporate Foundation for Solidarity, the Societe Generale Group has been committed to the professional integration of people facing difficulties since 2006.
- The Group wants to:
 - Capitalize on our solidarity initiatives to increase employees' commitment around the world. This is reflected in the implementation of solidarity initiatives which encourage and enable employees to give time during their working hours.
 - Ensuring and increasing the consistency of the Group's patronage and sponsorship activities around the world.

Since 2006, the Societe Generale Corporate Foundation for Solidarity has been active in the field of professional integration, especially by helping young people start their careers and by tackling illiteracy. In 2015, the Foundation is widening its scope to include education. In particular, since 2015, the Foundation has chosen to support charities that use sports and/or cultural activities to promote the education or integration of people in difficulty.

Citizenship approach: Integration

- Professional integration focused on helping young people find jobs and tackling illiteracy.
- Integration through education, especially sport or cultural activities.
- All entities must contribute to enriching Societe Generale's citizenship approach in one of the following ways:
 - Direct financial contribution (the company directly supports a project)
 - Through the intermediary of a sponsorship organization such as a corporate foundation or a comparable charitable-based organization.
 - At least 80% of the entities' citizenship budget must be spent on supporting initiatives matching the citizenship approach of education, professional integration and social inclusion.
 - The remaining 20% may be used for other community initiatives depending on specific local circumstances and after discussion with the Citizenship Team (COMM/CIT).
 - The charities supported must work in countries within Societe Generale's footprint.

The Societe Generale Corporate Foundation for Solidarity

- financially supports projects within the scope of the citizenship approach
- can supplement aid provided by an entity.

In addition to financial partnerships, entities are encouraged to develop initiatives that involve their staff.

Solidarity communication events will allow to highlight the projects for integration or education through sporting and cultural activities in the coming years.

PATRONAGE PROCEDURE

This procedure sets out the requirements to be completed prior to engaging in patronage activities on behalf of Societe Generale.

This procedure is to:

- ensure the appropriate level of preliminary verification and due diligence;
- ensure any potential or actual conflict of interest or bribery risk is identified and assessed; and
- ensure the sponsorship or patronage complies with the requirements of the SG Code regarding Section 5: Compliance Obligations Applicable to Sponsorship and Patronage Actions (SG Code Book B Title VI, Chapter 6).

Mandatory onboarding requirements including mandatory verification, due diligence, approval requirements, documentary and register requirements and controls would need to be implemented when dealing with patronage initiatives in whatever the field of action.

- [Partnership Guidelines](#)
- [Operational Procedure](#)
- [Planethic Reporting Tool](#)



Sources :

- <https://www.societegenerale.com/en/about-us/identity>
- https://www.societegenerale.com/sites/default/files/documents/Rapport-integre/2019/ri_sg_2019_eng.pdf
- <https://www.societegenerale.com/en/measuring-our-performance/csr/extra-financial-analysts-area>
- https://www.societegenerale.com/sites/default/files/documents/Document%20de%20r%C3%A9f%C3%A9rence/2019/ddr - 2019_societe-generale_eng_version.pdf#page=249
- <http://asiashare.hk.world.socgen/sites/Asiapac-SEGL-DEO-COS/SG%20Procedures/Sponsorship%20and%20Patronage/APAC%20Sponsorship%20and%20Patronage%20Procedure.pdf>

SOCIETE GENERALE INDIA

INTRODUCTION

Societe Generale was established in India in the year 1978. In 1985, Societe Generale Bank commenced operations as a Scheduled Commercial Bank in Mumbai. Since then it has a proud legacy of servicing corporates and clients.

Societe Generale operates through its local branches based in Mumbai and Delhi serving both:

- Indian corporates and financial institutions, helping them to expand their footprint outside of India
- Global clients of Societe Generale, from Europe, US, Middle-East, Africa and Asia-Pacific, to develop their operations in India.

INDIAN COMPANIES ACT

The policy is in line with Section 135 of the Companies Act 2013, as enacted in the Republic of India and as amended from time to time. It is applicable to every company, including its holding or subsidiary, and foreign companies having its branch or project office in India and requires companies with a net worth of INR 500 crores (INR 5 billion) or more, or an annual turnover of INR 1000 crores (INR 10 billion) or more, or net profit of INR 5 crores (INR 50 million) or more, to spend 2 percent of their average net profits of three years on CSR.

FOCUS AREAS

Societe Generale India is committed to improving quality of life of the people and be a positive change in a socially, ethically and environmentally friendly manner. All CSR initiatives will focus on the upliftment of the disadvantaged and marginalized sections of Society. The main objectives of the CSR initiatives are:

- a. to make a positive impact in the society through high impact programs
- b. to offer employees opportunities to support NGO partners through volunteering or skill sponsorship programs

The Policy recognizes that corporate social responsibility is not merely compliance; it is a commitment to support initiatives that measurably improve the lives of underprivileged by one or more of the following focus areas as notified under Schedule VII of the Companies Act and in line with guidance from SG Group Charitable Patronage Partnership. The entities will focus on the following areas:

1. Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
3. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
4. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water;

5. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
6. Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).

The CSR Committee may undertake any other projects or initiatives as laid down under the Schedule VII of the Companies Act.

Geographic Reach

Societe Generale will give preference to the local areas around its operations for spending the amount earmarked for CSR activities. At the same time also implement initiatives that can be scaled across India.

Beneficiaries

The beneficiaries of SG's CSR programs may be the following categories of people:

- Children / students
- Women
- Weaker sections of the society
- Others – society at large

CSR GOVERNANCE STRUCTURE

All SG entities in Mumbai, India will operate under a common policy at the group level for the country. In line with the extant CSR Regulations, the governance and implementation will be managed as defined by the Company's CSR Committee. The mode of implementation of CSR activities/programmes will include combination of direct implementation and implementation through NGO, Trust, Registered Societies etc.

It is proposed to set up the following CSR Committees to manage the CSR Activities of the SG Group in India:

CSR APEX COMMITTEE

The following persons shall constitute the Membership of the CSR Apex Committee:

Sr. No.	Name	Designation
1	Chief Executive and Chief Country Officer	Chairperson – SG Bank
2	Head of SGSIPL	Vice Chairperson - SGSIPL
3	COO and CFO, SG Bank	Vice Chairperson – SG Bank
4	Deputy CFO, SG Bank	Member
5	Director, Structured Finance and Coverage for Utilities and Infrastructure	Member
6	Head of Human Resources	Member
7	Vice President, SGSIPL	Vice Chairperson - SGSIPL
8	CSR Team	Member and Secretary

Appointment / Changes in Apex Committee Constitution

- The CEO of SG Bank will be the Chairperson and the Head of SGSIPL the Vice Chairperson of the CSR Apex Committee by default. This will apply to any new incumbent to these positions.
- Review and reconstitution of the membership of the India Apex CSR Committee, and change of the Terms of Reference of the Committee, as per the approval and discretion of the Chairperson of the Apex Committee.
- In a situation where the position of Chairperson is vacant, the Vice Chairperson will be appointed as the Acting Head of the Apex Committee by default
- Any change in the Committee composition will be at the discretion of the Chairperson of the Committee in consultation with the Vice Chairman
- Such changes, as mentioned above will be informed to the secretary of the committee, and if made, will be recorded in the following Apex Committee meeting

Functions of the Apex Committee

- To act as the nodal point for CSR Activities to be undertaken by the SG entities in Mumbai, India;

- To review and approve the SG India CSR Policy. And review and approve of any exception / annexures that may need to be included in the CSR Policy from time to time. The CSR Policy will stand approved once the Apex Committee detailed above gives an approval;
- To review and approve the various activities, projects or topics covered by CSR Activities as contemplated in terms of this Policy;
- To review and approve the execution plans and recommendations of the CSR Operations Committee;
- For an Apex Committee meeting to be recorded and any decision to be finalized, viz. NGO selection, funding, policy changes, budgets, etc. the quorum of the Apex Committee members mentioned above should mandatorily be present and they will authorize all CSR related decisions;
- To review and approve MIS, Data and other such Information, as may be required to be placed before the Board Level Committees of the respective SG India entities;
- The Apex Committee shall meet at least bi-annually to discuss, plan and evaluate action plans
- The decisions on the CSR expenditure taken in the committee will be minuted and shared with all the Apex Committee members and with the Operations Committee (as deemed appropriate) but only the Apex Committee members will authorize the same;
- While other members of the Committee can submit views and actions, the final decision of all actions will always lie with the CSR Apex Committee members;
- The CSR Team of SG Bank shall act as the nodal point of the Committee and coordinate actions between the Apex and Operations Committee;

CSR OPERATIONS COMMITTEE

The CSR Operations Committee will be constituted as follows:

- The CSR Team of SG Bank will act as the Chairperson and Secretary of the Operations Committee and be the link between the Apex and Operations Committee
- The committee will comprise of a minimum of 8 members from various staff members from SG Bank and SGSIPL
- The Operations Committee members can be chosen as per the following:
 - Volunteering (staff can volunteer to be a part of the Committee)
 - Chosen by CSR Apex Committee and the Chairperson of the Operations Committee (The Chairperson can directly choose members of staff to be a part of the committee who are inclined towards CSR)
 - The Operations committee will have a representation of members from various departments.
- The Operations Committee composition will be reviewed from time to time and members will be added and changed as per the above.
- Any change in the Operations Committee composition will be updated to Apex Committee via Minutes of the meeting held.

Functions of the Operations Committee

- To act as the implementation arm of the SG India Apex CSR Committee;
- To identify and shortlist NGOs, as per SG's focus areas and submit them to the Apex Committee for review;
- To make proposals or adjustments to the plan; to suggest new actions to the Apex Committee;
- To ensure proper participation by staff in the CSR Activities;
- To implement and report on the various activities, projects or topics, as may be approved by the India Apex Committee;

- To implement, review and propose the execution plans for each individual entity and minute action plans for Apex Committee’s perusal;
- To collate and maintain MIS, Data and other such Information provided by each entity, as may be required to be placed before the India Apex Committee;
- To meet at least bi-annually;
- To place all Minutes of the Meetings held before Apex Committee;
- To ensure that empaneled NGO’s KYC are in place before grants are made;
- To document and report of all CSR activities/ projects to the Apex Committee;

ENTITY LEVEL CSR COMMITTEE

As per Section 135 of the Companies Act 2013, two types of treatment apply to SG entities in India:

- For the Bank in India, which is treated as a “foreign company”, the Committee is expected to consist of two members viz. (i) a person resident in India authorized to accept on behalf of the company any notices / documents required to be served on the company and (ii) any other person nominated by the foreign company
- In case of Private Limited Company, the Committee shall consist of two Directors (all SG India entities are Private Limited Companies). In this regard, the CSR Committee of the following entity shall comprise as under:

Name of Entity	Directors	Designation
Societe Generale Securities India Private Limited	Head of SGSIPL	Chairperson
	Vice President	Vice - Chairperson

Meeting of the CSR Committee

- The meeting can be held through audio-visual electronic communication facilities provided that the number of members required to form a valid quorum participate at the meeting;
- The quorum for a meeting of the CSR Committee shall be 4 (four) members of the CSR Apex Committee. The quorum shall be present not only at the time of commencement of the meeting but also while transacting any business and throughout the meeting;
- Any questions at any meeting shall be decided by a majority of the votes of the members present at the meeting provided, however, that, if there is a deadlock between / amongst the members, the Chairperson shall have a second or a casting vote;
- Minutes of the meetings shall be prepared and shall be authorized accordingly

Notice of Meetings

- Meetings of the CSR Committee shall be summoned by the secretary of the CSR Committee, as necessary;
- Notice of each meeting confirming the venue, time and date together with an agenda of items to be discussed and supporting papers shall be forwarded as necessary to each member of the CSR Committee, or any other person required to attend

CSR FRAMEWORK

CSR ANNUAL BUDGET ALLOCATION

At the commencement of every financial year, the India Apex CSR Committee will convene a meeting, end of Q2/ early Q3 of every calendar year to discuss and decide on the following topics:

- The projects to be undertaken by each SG entity which will be in line with those defined in the proposal made by the Operations Committee. The provisional budget allocation will be made latest by September every year, based on estimations using the formula specified, as per the grid below:

Sr. No.	Entity name	Threshold
1.	SG	2% (as per Companies Act - as a % of profit of preceding three years average net profit the relevant entity) for CSR
2.	SGSIPL	2% (as per Companies Act - as a % of profit of preceding three years average net profit the relevant entity) for CSR

- All Expenses incurred within the CSR Budget will need to be approved by the quorum in the Apex Committee;

PROCESS OF IDENTIFICATION, SELECTION, ON-BOARDING AND MONITORING OF NGO PARTNERS

Identification of CSR Activities

- For focusing its CSR efforts, the Activities / Projects may be divided into two main categories – Direct Project Funding and Employee Engagement. Projects which involve considerable financial commitment undertaken on a timeframe of 1-3 years where SG will be the primary sponsor, will be considered under Direct Project Funding and accorded due significance. Initiatives involving employee participation in a CSR activity will fall under Employee Engagement;
- The Company shall conduct / implement its CSR programs through Trusts, Societies, or Section 8 companies operating in India, which are not set up by the Company itself, herein collectively referred to as ‘CSR Partner’ or ‘NGO Partner’;
- Suggestion of NGO Partner(s) for short listing will be received from:
 - The Apex Committee Members
 - The Operations Committee Members
 - NGOs / Partner(s) who approach SG CSR Team proactively for funding
- A list of CSR activities / projects which the Company plans to undertake during the implementation year will be laid down before the Committee at end of Q2/ early Q3 financial year, specifying modalities of execution in the areas / sectors chosen and implementation schedules for the same;
- NGOs should be in line with the Schedule VII, Section 135 of the Companies Act, which lays out the key areas to receive CSR funding, and in line with the SG rules of charitable patronage.
- Identification of activities / projects and the executing agency / NGO will be made, inter-alia, by assessing the following:
 - Project Objectives;
 - Baseline survey – As-is and To-be state basis, accordingly the outcome of the project will be measured;

- Implementation schedules – Timelines for milestones of the project will need to be prescribed and agreed upon;
- Responsibilities and authorities;
- Major results expected and measurable outcome including the expenses / charges ratio as against the actual CSR spend;
- Only activities which are not for the benefit of employees of the company or their family members shall be considered as CSR activity;

Selection, Screening, Due Diligence and onboarding of CSR Partners

Societe Generale India has formulated the criteria and procedure for selection, screening and due diligence of its implementing partners. They are as follows:

- Proposals along with their KYS documents will be invited and assessed - using a credibility, capability and fitment framework, potential NGO partners will be assessed
- A preliminary stage of partner due diligence is done to assess the credibility of an NGO Partner and their fitment to the SG International Patronage and India CSR Policy requirements
 - Does not contradict SG policies
 - Does not involve any ABC risk factors
 - Does not involve any potential conflict of interest
- The 4 main indicators of Due Diligence are:
 - SG Code - Does the NGO Partner comply with overall SG International and India Patronage Policy?
 - Credibility - Does the NGO Partner have a good reputation of delivering high impact projects within the ecosystem?
 - Financial Requirements - Does the NGO Partner comply with the financial requirements of SG International and India Patronage Policy?
 - Legal Requirements - Does the NGO Partner comply with the legal requirements of SG International and India Patronage Policy?
- Handover to KYP/Procurement/Compliance officer – The CSR team shares the necessary files with the Procurement for the next stage of NGO Partner selection/due diligence process.
- Out of the suggested NGO Partner(s), the ones that are aligned with SG’s focus area will be placed under consideration.
- The Operations Committee members will securitize the Partner(s) and propose their recommendation to the Apex Committee (Some Partner(s) that are recommended by Apex Committee Members and fall within the SG focus area, can directly be evaluated by the quorum);
- Apex Committee will refer to the proposal submitted by the Operations Committee members and invite the recommended Partner(s) to present to the Committee;
- Post internal agreement within the quorum of the Apex Committee, the on boarding process for Partner(s) will be initiated by the respective team. Each member of the CSR Apex Committee will sign the minutes and document the approval if a new Partner is appointed;
- The CSR team will work with the legal team to draft and sign-off a Memorandum of Association with the selected Ngo’s for the finalized of projects. The Framework Agreement will be signed for a minimum of two years with the NGO partner or as agreed upon by the CSR Apex Committee.

- The CSR Team will ensure time bound implementation and roll out of all the activities identified.

Monitoring Usage of Funds by CSR Partners

Societe Generale India shall institute a monitoring and review mechanism to monitor its CSR activity / project / programs. The monitoring mechanisms shall include:

- Any one Operations Committee Member shall visit each empaneled partner to see the workings and the project site visits to ensure the transparency quotient of the undertaken projects;
- The CSR Team will review the philanthropic activities of the Company and will provide progress update to the CSR Apex Committee every year as deemed fit;
- Review meetings with the CSR Partner and CSR Apex Committee on the progress made on the Project.
- At the end of the year each partner must submit:
 - An Audited report on the usage of the funds;
 - An audited report by an external independent auditor on the utilization of funds;

REPORTING OF CSR ACTIVITIES

In terms of the Companies Act, 2013, necessary disclosures shall be made in the Annual Reports of each of the SG entities that participate in the SG India CSR Program in the Annual Report / Notes to Account section. The format for the same has been specified and includes brief outline of the CSR Policy, composition of the CSR Committee, prescribed CSR expenditure, manner in which the amount is spent, reasons for not spending entire amount. The CSR Team to submit the same for approval to the CSR Apex Committee.

Administrative Expenditure for CSR Activities

Societe Generale India shall allocate at least 2% of its average net profits before taxes (EBT) of the preceding three years, towards CSR activities to improve the quality of life of the communities. The Company may build CSR capacity through its own programs or employee engagements. However, such expenditure, including expenditure on administrative overheads shall not exceed 5% of the total CSR expenditure in that year.

Treatment of Surplus

In case the company has failed to spend the 2% of the average net profit of the last three financial year, reasons for the same will be reported in the Annual Report of the Company. The surplus arising out of the CSR activities, projects or programs - if any - shall not form part of the business profit of a company and shall be ploughed back in activities as detailed in this document.

Planethic Reporting Tool

SG is required to maintain a complete, accurate and up-to-date register of patronage activities. Owned and administrated by SEGL/RSE, the Group's Planethic tool will be used for sponsorship and patronage registering under the oversight of COMM/DIR and CPLE/REO.

The purpose of Planethic as a register tool is to

- centralize data recording and storing of approval documents related to patronage actions in one tool, provided by the Group, for all BU/SU and entities; and
- provide an overview at BU/SU level and across the Group of all sponsorship and patronage activities.

The entity/BU/SU must maintain and control the recording at BU/SU level and with information populated. The entity/BU/SU are accountable for the content and data entered in Planethic under their scope.

COMM, as the delegated administrators for all BU/Sus in Asia Pacific, is the first level of contact regarding Planethic. They should be contacted for

- Requesting access to Planethic - a dedicated request form has to be filled out, validated by the manager of the requesting person and sent to the Delegated administrator who will then grant access for this user to the tool;
- Functional questions regarding the tool;
- Technical problems with the tool

CSR LEAVE FOR EMPLOYEES

Community Service Leave for Corporate Social Responsibility (or CSR leave) is offered to SG staff to reinforce their commitment towards community service and in effect, improve staff's engagement with the Bank as a preferred employer.

All staff of GBIS who are on SG payroll – administered in HCOM, including: permanent employees, expatriates, TCNs, VIEs, trainees, interns and contract staff, are entitled to two CSR leave days per calendar year to participate in charity events during any day of the week, including weekends and public holidays. The CSR leave cannot be carried forward or encashed.

Weekdays (normal work days):

In the event of staff participating in approved CSR events on weekdays, that period should be treated as CSR Leave, for up to two days in a calendar year.

Weekends, Evenings or Public Holidays:

In the event of staff participating in an approved charity event outside contracted working hours such as weekends, evenings or public holidays, then he/she is entitled to a working day off in lieu, for up to two days in a calendar year.

At least one of the two CSR leave days must be dedicated to SG-organized CSR events while the remaining day can be for participating in non-SG organized CSR events.

***Important Note for non-SG organized CSR activities:** Please seek approval from the CSR Committee (IN-SocGen-CSR@socgen.com) - before you participate in the event.

Staff who attends any approved CSR activities will be granted:

- 0.5-day CSR leave for attending events for up to 4 hours, or
- 1 full day CSR leave for attending events for more than 4 hours

Some Other Terms of Reference:

- In case of a project/proposal submitted by NGO/partner being exemplar does not meet the criteria's defined in CSR (Citizenship Commitment) focus areas, the CSR Operations team can seek an exception from the Chairperson and Vice Chairperson of the CSR Apex Committee to support the project proposal.
- No specific CSR activity or projects or programs shall be undertaken in pursuance of normal course of business of the Company;

- Any modification / amendment in the CSR Policy shall be carried out by the CSR Team with the prior approval of the authorized signatories of the CSR Apex Committee;
- This CSR Policy has been prepared by Societe Generale India in line with the provisions of Section 135 of the Companies Act 2013. This policy shall apply to all Corporate Social Responsibility (CSR) initiatives, projects, programs, and activities undertaken by Societe Generale India;
- This Policy shall serve as a guiding document to help identify, execute, and monitor CSR projects in keeping with the spirit of the Section 135 of the Company Act 2013 and Companies (Corporate Social Responsibility Rules), 2014;

CONTACT INFORMATION

For queries relating to the CSR Policy, please write to us at:
IN-SocGen-CSR@socgen.com

Our office address is:

Société Générale

19th Floor, Tower A, Peninsula Business Park, Ganpatrao Kadam Marg, Lower Parel, Mumbai - 400 013

Tel: +91 22 6630 9500

ANNEXURE – Schedule VII Section 135 Activities of the Companies Act,2013 Dated 11 October 2019

Activities which may be included by companies in their Corporate Social Responsibility Policies
Activities relating to: —

¹[(i) Eradicating hunger, poverty and malnutrition, ²["promoting health care including preventive health care"] and sanitation ⁴[including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation] and making available safe drinking water.

(ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.

(iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.

(iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water ⁴[including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga].

(v) 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 art and handicrafts;

(vi) measures for the benefit of armed forces veterans, war widows and their dependents;

(vii) training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports

(viii) contribution to the prime minister's national relief fund or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;

⁶[(ix) Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).]

(x) rural development projects]

³[(xi) slum area development.

Explanation.- For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.]

⁵[(xii) disaster management, including relief, rehabilitation and reconstruction activities.]

Amendments

1. Substituted by Notification Dated 27th February, 2014. - Original Content

2. Substituted by Notification Dated 31st March, 2014.

For the words "promoting preventive health care" read "promoting health care including preventive health care".

3. Inserted by Notification Dated 7th August, 2014.

4. Inserted by Notification Dated 24th October, 2014.

5. Inserted by Notification dated 30th may 2019.

6. Substituted by Notification Dated 11th October 2019.

in Schedule VII for the item no. ix.;

ix. contributions or funds provided to technology incubators located within academic institutions which are approved by the central govt.

the following item and entries shall be substituted namely,

(ix) Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).

ANNEXURE - CSR Leave Approval and Application

CSR Leave Approval and Application (CSR day during working hours)

- Step 1: For SG organized event – No specific approval is required.
For non-SG organized event – Obtain an email approval from the CSR Committee prior to the event. The request to the Committee shall include:
- Name, date, time and description of the event.
 - Duration of the activities and time intended to spend attending the activities.
- Step 2: Submit the “Community Service Leave” application on HCOM prior to the event. Where the event is non-SG organized, await the CSR Committee’s approval before proceeding to this step/
Staff needs to state clearly in HCOM whether it is:
- an SG organized CSR event, or
 - a non-SG organized CSR event

CSR Leave Approval (CSR day outside working hours)

- Step 1: The manager provides the first level approval. Employees should seek approval in advance for CSR leave and will ensure that their CSR leave application does not impact the effective running of the team. Managers will not unduly withhold their consent to CSR leave.
- Step 2: Attend the event and then submit the “Community Service Leave” application in HCOM.
- Step 3: For SG-organized event – the CSR Committee will provide an attendance log within 1 week after the event to local HR department for leave application verification
- For non-SG organized event – Staff to submit details of the CSR Committee’s approval to MyHR, for leave application verification. Staff are not requested to provide evidence of their attendance. However, HR or the CSR Committee may request further details from the staff in respect of their attendance to ensure the validity of the HCOM submission.

In both scenarios, HR and CSR Team provides the final approval of the “Community Service Leave” in HCOM.