

Schindler India Pvt. Ltd. Mumbai 400 076.	Policy on Corporate Social Responsibility	Company Policy	
		Policy No. HR/007	Valid From: 4 th Nov'14
Revision No. 1		Page 1 of 7	
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V1		Signature	Original Signed	Original Signed	Original Signed
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Original signed document, document history and versions are filed by HR					

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0.0 PROCESS OWNER

Human Resources

1.0 PURPOSE

Corporate Social Responsibility (CSR) is the Company's commitment to all its stakeholders to conduct business in an economically, socially and environmentally sustainable manner that is transparent and ethical.

Schindler India's commitment to Corporate Social Responsibility includes undertaking of CSR activities in accordance with the provisions of Section 135 of the Indian Companies Act, 2013 and related Rules, as modified from time to time.

Schindler India is committed to serving its clients and to delivering competitive products, industry leading services and world-class customer care. The Company strives to contribute to society by being a good corporate citizen to make a positive social impact. This policy establishes the process and mechanism, in broad terms, for the implementation and monitoring of the CSR activities for Schindler India.

2.0 SCOPE

The Policy underpins Schindler Group's Sustainability Policy and covers current as well as proposed CSR activities to be undertaken by the Company and their alignment with Schedule VII to the Companies Act, 2013, relating to CSR activities, as amended from time to time and outlines the process for implementation of the same at Schindler India.

3.0 THE CSR COMMITTEE

3.1 Constitution

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. The current directors are two (3.11.2014) and hence members are:

1. Mr. Miguel A. Rodriguez, MKL - APME
2. Mr. Uday Kulkarni, President - India & South Asia

3.1.1 Responsibilities of CSR Committee

1. Evaluate projects suggested by the Program Management Committees, and approve the social investments
2. Meet once a year to review the progress made
3. Recommend to the Board of Directors any changes or modification in this Policy.
4. Recommend to the Board of Directors amount of expenditure to be incurred on the activities.

3.2 CSR Program Management Committee

The Program Management Committee (PMC) is responsible for ensuring the smooth execution of all the projects as per Policy. The committee will report to the Board-level CSR Committee. The current members are:

1. Ms. Shubha Arora, Chief People Officer, India & South Asia

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2. Ms. Sheetal Shah, DGM – Strategic HR Projects, India & South Asia

3.2.1 Responsibilities of the Program Management Committee

1. Formulate and conduct continuous reviews of the Company's CSR Policy
2. Propose projects, activities and partnerships in line with CSR policy to the CSR committee
3. Execute the decisions taken by the CSR Committee
4. Monitor on-ground implementation of projects
5. Provide periodic reports to the CSR Committee
6. Quarterly internal reviews

3.3 Program Manager

The individual program managers will be responsible for the actual on-ground implementation of the projects. Current Program Managers include:

1. KG India programs – Ms. Sheetal Shah, DGM – Strategic HR Projects, ISA
2. KW India programs – Mr. Vinod Parur, Vice President – HR, KW - IND
3. Elevator & Escalator Safety Trust – Mr. Nimish Deshpande, Sr. Vice President – Technical, KG - IND

3.3.1 Responsibilities of Program Manager

1. Evaluate projects as per the developed framework
2. Implement projects based on set targets and action plans
3. Regularly monitor the activities
4. Send quarterly reports to the Program Management Committee
5. Find suitable implementation partners, conduct due diligence and present to the CSR PMC
6. Evaluate possible collaborations with other organizations on CSR projects
7. Ensure on-ground implementation of projects

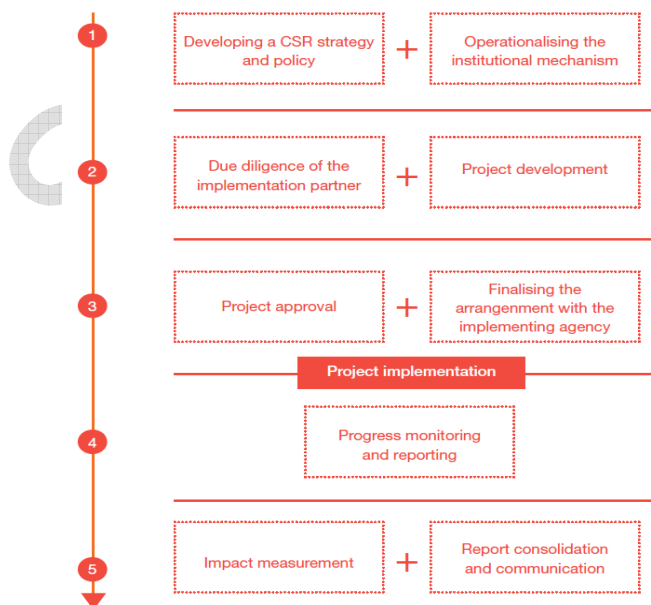
4.0 CSR ACTIVITIES AND IMPLEMENTATION

In line with Schedule VII to the Act and the CSR Rules and circulars/notifications, as may be applicable, the Company shall undertake CSR activities included in its CSR Plan, as recommended by the CSR Program Management Committee at the beginning of each year. The CSR Committee is authorized to approve any modification to the existing CSR Plan or to propose any new program during the financial year under review.

1. Schindler India's CSR agenda named '**Fulfill Futures**' is outlined in the Statement of Intent (Annexure 1). This program is focused on supporting sustainable initiatives for the construction and agriculture communities to bring about positive developments to the extended circle of influence of our business.
2. The KG will largely focus on the construction community and promote projects/activities in the field of Education:
 - Support primary and secondary education of children of construction workers
 - Support education for students from economically disadvantaged background pursuing degrees in engineering and architecture
 - Develop and promote vocational skills related construction industry to assist professional growth and promote employability

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3. The KW undertakes CSR activities based on needs generated from the disadvantaged communities in the vicinity of the Factory (Orchid Project) situated in Pune.
4. The Company will focus on projects aligned to Schindler Values. This includes conducting advocacy sessions on safe usage of Elevator and Escalators.
5. Schindler may also undertake other CSR activities in line with Schedule VII.
6. The following activities will not qualify as CSR Activities as under the Companies Act, 2013:
 - Projects or activities not falling within Schedule VII
 - Activities undertaken in pursuance of normal course of business
 - Projects or programs or activities that benefit only the employees of Schindler and their families
 - Direct or indirect contribution to any political party
7. The qualified projects/activities can either be implemented by:
 - Directly the Company
 - Through its own non-profit foundation set-up so as to facilitate this initiative
 - Through independently registered non-profit organizations that have a record of at least three years in similar such related activities
 - Collaborating or pooling our resources with other companies
8. In case the project is being implemented by an external implementing agency, it must fulfill the following criteria:
 - It must be a registered Trust, Society or a Section 8 company
 - It must have an experience of at least 3 years in the area of intervention
 - It must have the capacity to monitor and track the projects based on the criteria and requirements of Schindler India
 - It must have a Schedule VII tag i.e. be aligned with one of the causes mentioned in Schedule VII or related activities.
9. The CSR activities shall be undertaken in locations within India. Schindler shall give preference to the local areas and the areas around which Schindler operates while considering investments for CSR activities. However, Schindler has a multi-city presence and hence may be guided by the requirements of the specific CSR activity/program in determining the locations within India.
10. Following chart briefly illustrates the process for CSR projects/activities:



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5.0 CSR BUDGET AND SPENDS

1. The Act mandates companies meeting the qualification criteria to allocate certain portion of its annual net profits (before tax) during the three immediately preceding financial years to be spent on CSR Activities that fall under purview of Schedule VII to the Act.
2. Net profit means profit more fully described under Rule 2(f) of the CSR Rules. The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by the Board of Directors on the recommendation of its CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII to the Act.
3. CSR expenditure shall not include Projects or programs or activities undertaken outside India.
4. Surplus (A surplus is anything that is generated over and above the total expenditure on that particular project) generated by a CSR project must not be considered in the normal business profits of the Company, but must be channelized into its CSR corpus. Hence, the CSR corpus of the Company for the succeeding year would include such surpluses, over and above the Company's 2% calculation.
5. If a surplus is being generated by any of these projects, it must be noted that the surplus must be considered only in the year that the CSR amount is being spent. Also, the surpluses that are generated must be directly related to the activity being performed.
6. Contributions by other Schindler companies and employees may also be received and utilized in respect of the CSR activities undertaken.
7. In case the Company fails to spend the above targeted amount in that particular financial year, the Committee shall submit a report in writing 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 Directors' Report for that particular Financial Year.

6.0 MONITORING & REPORTING

The CSR Program Management Committee (PMC) will submit periodic reports to the CSR Committee of the Company on the progress of the various projects approved by the Committee and entrusted to the PMC for implementation and monitoring.

PMC shall assist the CSR Committee to prepare reports that are required to be placed before the Board. The format of the Report shall be the format prescribed under the CSR Rules stated under Annexure 1.

7.0 PUBLICATION OF CSR POLICY AND PROGRAMS

As per the CSR Rules, the contents of the CSR Policy shall be included in the Directors' Report and the same shall be displayed on the Company's website and Intranet.

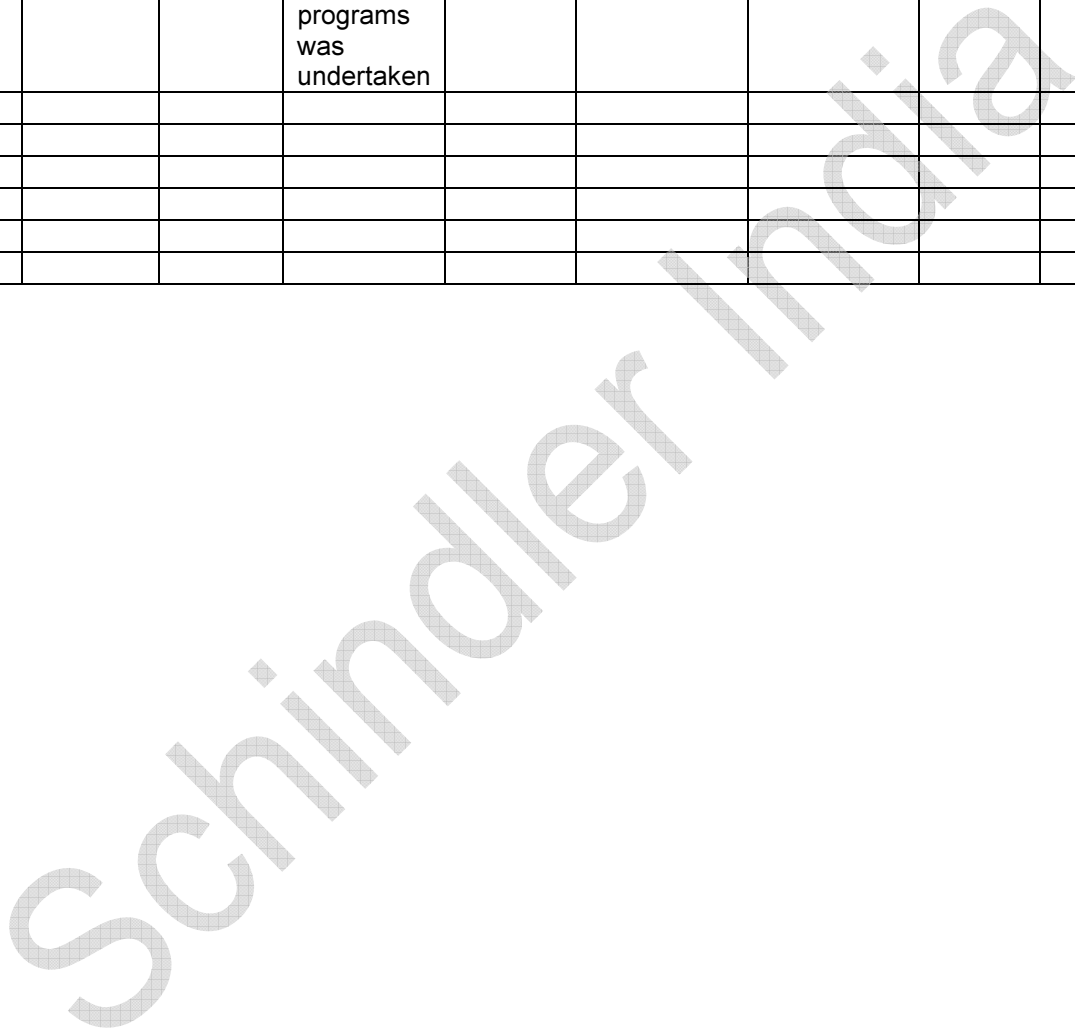
8.0 POLICY CHANGE

The Committee shall annually review its CSR Policy from time to time and make suitable changes as may be required and submit the same for the approval of the Board.

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Annexure 1: CSR Reporting Format

Sr. No.	CSR Project/ Activity Identified	Sector for which the Project is covered	Project or Programs 1) Local Areas, 2) Specify the state and district where projects or programs was undertaken	Budget (Project or Program)	Amount spent on Project or Program	Cumulative Expenditure	Amount Spent Direct or through Agency	Target Date/Status
					Direct Expenditure			
					Overheads			



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Annexure 2: Activities under Schedule VII to the Companies Act, 2013

- Eradicating Hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and differently abled and livelihood enhancement projects
- Promoting Gender equality, empowering women, setting up homes, and hostels for women and orphans; setting up old age homes, day care centers and other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups
- Ensuring Environmental Sustainability, Ecological Balance, Protection of Flora and Fauna, Animal Welfare, Agroforestry, Conservation of Natural Resources and Maintaining the Quality of Soil, Air and Water
- 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 arts and handicrafts
- Measures for the benefit of armed forces veterans, war widows and their dependents
- Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympics
- Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for Socio-Economic development for relief and development of SCs, STs, OBCs, minorities and women
- Contributions or funds provided to Technology Incubators located within Academic institutions approved by the Central Government
- Rural Development Projects
- 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.