



**Corporate Social Responsibility Policy**  
**Peregrine Guarding Private Limited**  
**(“PGPL”)**

**This CSR Policy is effective from 01.04.2014**  
**Updated on August 21, 2018**

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## BACKGROUND

Peregrine Guarding Private Limited (hereinafter referred as “PGPL”/”Company”) is a Security services company.

Peregrine Guarding Private Limited, established in 2003 is a leading player in Providing Security Services in India and outside India. Within 15 years from inception, PGPL has been imbued with a mission to deliver Gold Standard Security services, in the areas of Individual Protection, Industrial, Domestic, Commercial, aviation Computer Defence in India and Abroad . “PGPL” has a network to enter in Joint venture with Indian / Foreign Company engaged in the Security related filed. PGPL is engaged in conducting and providing large range of Security related services throughout India and abroad. PGPL is running its Security Services through well trained and highly qualified staff in order to maintain a high level of quality.

PGPL has a presence across over many cities/towns in India and outside India.

Further in providing guidance on its conduct, the Company has chosen to articulate the following, amongst others, principles under its Code of Conduct–

- Conduct our operations in an honest and fair manner with integrity and openness
- Respect human rights, dignity and legitimate interests of all individuals directly and indirectly associated with us
- Provide a safe, healthy work and business environment to all persons directly and indirectly associated with us
- At all times ensure conduct, which sustains, enhances the global reputation and image of the organization

In the context of the above and in order to bring clarity to its position vis-à-vis social activities, the company now wishes to formally communicate its position as a member of the community and establish for both internal and external stakeholders, its philosophy, guiding principles and areas of focus that it would as an organization seek to promote in the arena of Corporate Social Responsibility (CSR).

***This document is in keeping with the current maturity of the organization and is expected to evolve with the growth of the organization, dynamic needs of society and the community in which the company operates.***

This policy is a forward-looking aspirational document, which establishes the parameters and foundation upon which the Corporate Social Responsibility initiatives would be built:

- a. under the leadership and direction of the Company’s Board
- b. with active participation of its senior leadership and all employees and

- c. in partnership under a spirit of “togetherness” with any such partner who shares a common vision and objective of making a positive impact on society, and wishing to leave this world and humanity in a better place than the one we inherited.

## PHILOSOPHY

“Corporate Social Responsibility is the continuing commitment by business to behave ethically and contribute to economic development while improving the quality of life of the workforce and their families as well as of the local community and society at large”

Lord Holme and Richard Watts

For us in Peregrine Guarding Private Limited, “PGPL”, we believe in contributing to the growth/development of underserved communities and society at large. We understand that for a healthy society, every enterprise must contribute in development of underserved communities and society at large.

Recognizing that business enterprises are economic organs of society and draw on societal resources, we believe that a company's performance must be measured by its Triple Bottom Line contribution to building economic, social and environmental capital towards enhancing societal sustainability. In line with this, our effort will ensure improvement in quality of life of underserved communities and environmental sustainability. Programmes, projects and activities (collectively "CSR Programmes") carried out in this regard are the subject matter of this Policy.

Peregrine Guarding Private Limited (“PGPL”) believes and strives towards a healthier humanity.

Peregrine Guarding Private Limited (“PGPL”) believes in sustainable development, growing our business in a socially and environmentally responsible way, while meeting the legitimate interests of our stakeholders.

Peregrine Guarding Private Limited (“PGPL”) believes it, along with all its employee members, is an important participant of society and as such has an obligation to participate and drive social change not only in the areas of its competence but also in such which impact its existence and sustainability.

Peregrine Guarding Private Limited (“PGPL”) believes in taking an active role and responsibility in empowering communities in which it operates through social development initiatives which drive positive change and support its objective in improving and sustaining the health and wellbeing of humanity.

Peregrine Guarding Private Limited (“PGPL”) corporate social responsibility aims at being linked to sustainable development; economic, social and environmental requirements of society as a whole and of future generations.

## OBJECTIVE

As a Security Service Provider, Peregrine Guarding Private Limited (“PGPL”) through this Policy and its initiatives under CSR aims at:

- Creating and driving positive impact and outcomes in social development
- Working to increase expertise and advances in healthcare capacity building to serve society and the community it operates in and through their help improve the health and quality of life.
- Sustainable investment towards fulfilling its obligations as a member of society and enhancing its relationships with all its stakeholders and communities including its employees
- Fulfilling its social responsibilities alongside its normal business activities

As stated earlier our policies and objectives will evolve, and over time harmonize our long term and short term goals in CSR. Our ultimate goal is to wholesomely and positively impact the communities we are associated with irrespective of linkage to our core operating areas of healthcare delivery. In the short term and consistent with that view we propose to utilize and leverage our competencies and work in areas associated with healthcare.

## APPLICABILITY

This policy is applicable to Peregrine Guarding Private Limited (“PGPL”) as it is falling under the Section 135 of the Act.

Every company having net worth of rupees five hundred crore or more, or turnover of rupees one thousand crore or more or a net profit of rupees five crore or more during the immediately preceding financial year shall constitute a Corporate Social Responsibility Committee of the Board consisting of three or more directors, out of which at least one director shall be an independent director.

*Constitute Corporate Social Responsibility Committee of the Company comprising of 3 Directors (as per Companies (Corporate Social Responsibility Policy) Rules, 2014, a private company under Section 135(1) which is not required to appoint independent director pursuant to Section 149(4) shall have its CSR Committee without such director};*

It is also the stated intention of Peregrine Guarding Private Limited (“PGPL”) to align and partner with external partners in the true spirit of “togetherness” to maximize the impact and contribution to social development and change. In that regard while this Policy may provide a foundation and context for such alignments, the scope of this Policy is not meant to restrict opportunities for any such alliance which can be structured to meet the needs of the partner and its objectives.

## LEGISLATION

While this Policy is the stated position of the Company in the area of Corporate Social Responsibility and finds its independent justification under the Philosophy and business objectives of the organization, it also has linkage to the regulatory requirements as prescribed under the Companies Act, 2013 and Rules established thereunder.

In that context the Corporate Social Responsibility Policy is aligned and subject to the following legislations and rules established thereunder:

1. Section 135 of the Companies Act, 2013; This CSR Policy is effective from 01.04.2014 and we updated on August 21, 2018.
2. Companies (CSR Policy) Rules 2014;
3. Schedule – VII of the Companies Act, 2013; and
4. General circulars or Notifications as issued by the Ministry of Corporate Affairs from time to time, including:
  - ⇒ *Circular dated June 18, 2014, issued by Ministry of Corporate Affairs*
  - ⇒ *General Circular September 17, 2014 issued by Ministry of Corporate Affairs*
  - ⇒ *General Circular September 16, 2015 issued by Ministry of Corporate Affairs*
  - ⇒ *General Circular January 12, 2016 issued by Ministry of Corporate Affairs*
  - ⇒ *General Circular May 16, 2016 issued by Ministry of Corporate Affairs*

## DEFINITION

1. "Act" means the Companies Act, 2013;
2. "Average Net Profit" means the profit calculated in accordance with the provisions of Section 198 of the Act.
3. "Company" means Peregrine Guarding Private Limited (“PGPL”)
4. "CSR Committee" means the Committee as constituted by the Board of Directors of the Company in compliance with Section 135 of the Act and rules made thereunder;

5. "Net profit" means the net profit of the Company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely:-
- i) any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise; and
  - ii) any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Act:

Provided that net profit in respect of a financial year for which the relevant financial statements were prepared in accordance with the provisions of the Companies Act, 1956, shall not be required to be re-calculated in accordance with the provisions of the Act.

6. "Net worth" means the aggregate value of the paid-up share capital and all reserves created out of the profits and securities premium account, after deducting the aggregate value of the accumulated losses, deferred expenditure and miscellaneous expenditure not written off, as per the audited balance sheet, but does not include reserves created out of revaluation of assets, write-back of depreciation and amalgamation.
7. "Rules" mean the Companies (Corporate Social Responsibility Policy) Rules, 2014.
8. "Turnover" means the aggregate value of the realization of amount made from the sale, supply or distribution of goods or on account of services rendered, or both, by the Company during a financial year.

Words and expressions used and not defined hereinabove but defined the Act and / or Rules shall have the same meanings respective assigned to them in the Act and / or Rules, as the case may be.

## POLICY STATEMENT

As a responsible company, saving and enriching lives, improving and managing the health of its customers and serving the community all converge to define the purpose of Peregrine Guarding Private Limited ("PGPL") core business.

Drawing from its vision and mission statement, through CSR Peregrine Guarding Private Limited ("PGPL") seeks to proactively engage with society by working with communities to improve their well-being in a compassionate and sensitive manner. Peregrine Guarding Private Limited ("PGPL") seeks to bring focus to community welfare in Healthcare.

Within this overarching Policy, the company will implement its Corporate Social Responsibility initiatives, under the following principles:

Our Company is intending to sponsor trust, Construction of School Buildings ,society or company that undertakes programs or projects similar to CSR activities as specified in Schedule VII of the Act. Following are the activities specified in Schedule VII of the Companies Act, 2013.

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

1[(i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach 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 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.

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

(x) rural development projects.

(xii) slum area development.



## ORGANISATION

Cumulatively the objective would be to ensure compliance with Section 135 of the Companies Act 2013. Besides the same and to specifically clarify, the Company either by itself or in partnership with holding company and/or others may initiate or continue to pursue such other social improvement initiatives whether listed under Schedule VII of the Act or not.

## ROLES & RESPONSIBILITIES

Operational responsibility to the Corporate Social Responsibility Programs resides with Peregrine Guarding Private Limited ("PGPL"), championed and lead by the CSR Lead.

Others listed below are expected to give their full co-operation in ensuring that the company implements the approved annual plans, complies with any relevant change in legislation, meets new CSR requirements and identify areas in need of improvement.

### A. PGPL Board

- Constitution of the CSR Committee;
- Approval of the CSR Policy considering recommendations of CSR Committee; and
- Ensure that the activities as included in CSR Policy are undertaken by the Company
- Support the CSR Policy implementation by giving it visibility under adequate, timely and impactful communication

### B. CSR Committee

- Every year, the CSR Committee will place for the Board's approval, a CSR Plan (Like Construction of School Buildings and etc.) delineating the CSR Programmes to be carried out during the financial year and the specified budgets thereof. The Board will consider and approve the CSR Plan with any modification that may be deemed necessary.
- Formulation and recommendation to the Board, of a Corporate Social Responsibility Policy;
- Recommendation of CSR activities / programs to be undertaken by the Company under the Policy; reviewing and approving the annual budget thereon; and
- Monitoring the execution and adherence to the CSR Policy and annual plans on a continues basis; and
- Institutionalizing a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the company.

### **C. PGPL Management**

- Recommend the Annual Operating Plan (AOP);
- Propose the annual budgets (long term and short term);
- Report to CSR Committee as per the approved schedule; and
- Create CSR reports to be presented to the Board.

### **D. CSR Lead**

- Formulate and propose the strategy for Corporate Social Responsibility activities as per the company's philosophy (in alignment with statute) and otherwise;
- Design and propose CSR Programs
- Ensure execution of Corporate Social Responsibility projects/programs as per the approved plan;
- Identify, build and leverage external partnerships towards common objectives in the arena of CSR
- Liaison with eligible agencies for smooth implementation of initiatives; and
- Supervise and manage the CSR teams and inter-dependencies in the area of CSR
- Report progress to Management and the CSR Committee
- Create project application and reporting formats.
- Create visibility of the policy and implemented initiatives

## **SOURCE OF SUPPORT**

### **Financial Support:**

- Allocation of budget on annual basis by the company
- Contributions from the employees and stakeholders
- Corpus contribution by the company
- External contribution from partners and stakeholders

### **Personnel Support**

- PGPL employees as volunteers
- Other like-minded corporates aiming to create a positive difference in the society

## **MONITORING**

1. Every six months the Board of Directors of the Company will review the reports of CSR Committee of the Company on implementation of CSR programs / projects.

2. The CSR Committee will evaluate, review, approve and monitor CSR projects on a Cost Benefit and Impact Analysis. The proposal would include details to the amount of financial involvement, indirect costs impact, detailed project report and plan.
3. External help for the development and execution of such programs may be sought per scale and need determined by the CSR Lead.

Apart from abovementioned reports, the PGPL CSR Foundation/ Third Party Eligible Agency/ Entity will also submit the following to CSR Committee on regular intervals:

- a. A Feasibility and Impact Assessment of continuing a particular program implemented through an external agency or via the internal CSR delivery vehicle; and
- c. Quarterly & annual report(s) to CSR Committee highlighting the outcomes and challenges of the program/projects in specific detail along with a financial report.
- d. Confirmation to compliance to other legal and statutory requirements as necessary

## REPORTING / DISCLOSURE

Apart from the reporting requirement as mentioned hereinabove in the Policy, following regulatory disclosure requirements also need to be complied in relation to CSR activities of the Company.

CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Programs undertaken in accordance with the approved CSR Plan. Moreover, any surplus arising from any CSR Programs shall be used for CSR. Accordingly, any income arising from CSR Programs will be netted off from the CSR expenditure and such net amount will be reported as CSR expenditure and

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

- Composition of the CSR Committee shall be disclosed in the Board Report;
- The Board Report shall include an annual report on CSR activities in prescribed format (by MCA) containing specified particulars i.e. Brief Outline of CSR Policy,
- The Board of every company shall ensure that the company spends, in every financial year, at least two per cent. of the average net profits of the company made during the three immediately preceding financial years, in pursuance of its Corporate Social Responsibility Policy.
- If the company fails to spend the prescribed amount, the Board shall, in its report specify the reasons for not spending the amount;
- The content of Corporate Social Responsibility (CSR) Policy shall be displayed on the company's website, if any

- A comprehensive annual CSR Report detailing the initiatives with relevant annexures and photographs along with account statement (all inclusive) shall be created and communicated for internal company records.

## REPORTING FORMATS & TEMPLATES

Format of Reporting for Directors' Report: As per **Annexure – 1**

*Annexure I*

### **FORMAT**

#### **ANNUAL REPORT ON CSR ACTIVITIES TO BE INCLUDED IN THE BOARD'S REPORT**

1. A brief outline of the company's CSR policy, including overview of projects or programs proposed to be undertaken and a reference to the web-link to the CSR policy and projects or programs.
2. The Composition of the CSR Committee.
3. average net profits of the company made during the three immediately preceding financial years,
4. Prescribed CSR Expenditure (two per cent. of the amount as in item 3 above)
5. Details of CSR spent during the financial year.
  - a. Total amount to be spent for the financial year;
  - b. Amount unspent, if any;
  - c. Manner in which the amount spent during the financial year is detailed below

S.No.	CSR project or activity identified	Sector in which the project is covered	Projects or programme: (i) Local area or other (ii) Specify the state or district where the projects or programmes was undertaken	Amount outlay (Budget) project or programme wise	Amount spent on project or programs: Sub head: 1. Direct expenditure on project or programme; 2. Overheads	Cumulative expenditure up to the date of reporting	Amount spent: Direct or through implementing agencies*
1							
2							
3							
Total							

*\*Give details of implementing agencies.*

6. In case the company has failed to spend the two per cent of the average net profit of the last three financial years or any part thereof, the company shall provide the reasons for not spending the amount in its Board report.
7. A responsibility statement of the CSR Committee that the implementation and monitoring of CSR Policy, is in compliance with CSR objectives and Policy of the company.