

Mitsubishi Elevator India Private Limited

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

Formulated by CSR Committee	Reviewed by CSR Committee	Approved by Board
On 27 th March 2015	-	28 th March 2015
	23 rd October 2015	1 st December 2015
	27 th February 2016	
	06 th April, 2018	18 th July, 2018
	2 nd Dec 2019	13 th Dec 2019

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1. Preamble

Corporate Social Responsibility (CSR) is the affirmation that the Company is committed to contribution to Society in line with one of the three principles of Mitsubishi.

The Corporate Social Responsibility Policy of Mitsubishi Elevator India Private Limited is formulated in accordance with the provisions of section 135 of the Companies Act 2013 read with Companies (Corporate Social Responsibility Policy) Rules 2014.

2. Objective

- a) To deliver superior and sustainable value to the Society with long term vision.
- b) To deliver and enhance - Social, Environmental and Economic Value to the Society.
- c) To Institute a process and a suitable mechanism for the implementation and monitoring of the CSR activities.

3. Composition of Committee

As per section 135 of the Companies Act 2013, the CSR Committee shall consist of minimum two directors.

4. Meetings and Quorum

The CSR Committee shall meet at least twice in a financial year and the quorum for the meeting shall be two.

The Company Secretary shall play the role of Secretary to the Committee and assist the Committee in convening the meetings and recording the proceedings.

5. Duties & Responsibilities of the CSR Committee

The Duties and Responsibilities of the CSR Committee are to

- a) Formulate this CSR Policy and recommend to the Board for approval
- b) Suggest the relevant CSR activities to be carried out
- c) Recommend the amount of CSR Expenditure to be incurred
- d) Institute a transparent mechanism for implementation of CSR activities and control the same effectively.
- e) Ascertain the effectiveness of the programme through surveys.
- f) Prepare and submit an Annual Report to the Board on the CSR activities in a specified format **Annexure - II**

6. Responsibilities of the Board

The Board will have the following responsibilities

- a) Formally approve the CSR Policy and the expenditure proposed on the CSR activities by the CSR Committee.
- b) Confirm that such activities fall under the specification of the schedule VII.(Annex I)
- c) Ensure that at least 2% of average net profit made during the last 3 financial years shall be spent on the CSR activities.
- d) Assure that the contents of the CSR policy and its activities shall be promptly displayed in the website.
- e) Ensure that an annual report on CSR activities shall be included in the Directors' Report every year in the prescribed format.(Annex II)
- g) The Board shall undertake CSR activities directly. However in future, it may decide whether to do the same through a Trust or in association with any other society or authorized arrangement.

7. CSR Expenditure

The norms for CSR Expenditure shall be as detailed below and subject to change as may be directed by the government from time to time.

- a) To spend 2% of the average net profit declared in the company profit and loss statement in the immediately preceding 3 years
- b) Shall not qualify if spent on projects other than specified in the schedule VII
- c) The surplus arising out of CSR activities shall not be construed as business profit.
- d) The employees or affiliates can also contribute and the same can be utilized in the CSR activities. Such contribution is treated as in addition to (a) above.

8. CSR Activities

Our CSR policy proposes to carry out related activities chosen from Schedule VII to the Companies Act 2013: Refer- **Annexure I**

9. CSR Implementation Team

- a) "**CSR Implementation Team**" is constituted with an objective to identify and implement the CSR activities of the Company successfully.
- b) The members of the "CSR Implementation Team" would be selected from each department in order to have consensus among the departments on identifying and implementing the CSR activities of the Company.

- c) The “CSR Implementation Team” would comprise of following Section of Company:

Window person

Company Secretary

**Supporting Members Representing multiple departments
of Corporate and Factory**

Representatives from above department/section are not limited including window person. Other department(s) may be added or changed based on the request.

Individual Names of representative from each department/section shall be mention in the Annexure-III of this Policy.”

- d) The “CSR Implementation Team” shall report to the CSR Committee members periodically.
- e) It shall do preliminary study in identifying and implementing the CSR activities of the Company.
- f) It shall submit the proposal of CSR activities to the CSR Committee for approval.
- g) Upon approval of the CSR Committee, it shall implement the CSR activities of the Company and report to the Committee the progress of the CSR activities.
- h) It shall meet at regular intervals OR as and when required and report to the Committee the minutes of its meeting.

10. Implementation of CSR Activities

- a) The implementation of CSR activities shall be carried out by the “CSR Implementation Team” authorized by the Board of Directors.
- b) The Company shall undertake the CSR activities directly and / or also through NGO's, Non-Profit Organizations, etc. however, such Entities shall have an established positive track record as prescribed under law.
- c) Involvement of the employees in the CSR activities will be encouraged for realizing their full potential and making them as responsible citizens.
- d) Such initiatives undertaken may be communicated through awareness campaigns and other appropriate tools to attract maximum employee participation.
- e) The following activities **DO NOT** qualify as CSR activity
- Any activity other than specified in the schedule VII
 - Activity done in the normal course of business
 - Any activity benefitting only the employees of the Company and their families
 - Contribution to any political party directly or indirectly.

- f) All the CSR activities as introduced by any Region or Corporate/Factory office through CSR Implementation Team, which shall be undertaken with support of NGO's or Non-Profit Organisation or directly etc., as per clause (b) above, shall mandatorily adhere to the Anti-Bribery Rules of the Company as per Article No. 7 of the Anti-Bribery Rules by filing necessary forms for approval under the said rules.

11. Procedure for review and approval of CSR proposals

- a) Once in a quarter of every financial year, the CSR Implementation Team shall review and consolidate all the CSR proposals identified by them during the said quarter.
- b) In the following month of every quarter of a financial year, the CSR Implementation Team shall present their consolidated proposals to the CSR Committee for approval.
- c) The CSR Committee shall review and approve the proposals based on the merits.
- d) After approval of the CSR Committee, the CSR Implementation Team shall carry out the approved CSR activities.

12. Enhancing CSR Team Capabilities

An amount not exceeding 5% of the total CSR expenditure may be spent through any institution with established track record for enhancing the skills and capabilities of the Company employees in implementing the CSR activities.

13. Reporting of CSR

Details of CSR activities undertaken in every financial year shall be entered in a format (**Annexure II**) and included in the Annual Report. The Board Report will contain a responsibility statement from the CSR Committee on the implementation, monitoring and compliance of the CSR objectives of the Company.

14. Website Display

The Company shall display through a link in its website (www.mitsubishielevator.in) the contents of its CSR policy and all relevant information as may be required. The web link should also be updated regularly.

15. Review and Audit

- a) The CSR Committee shall be subject to appraisal. The policy contents and implementation progress shall be monitored.
- b) The Company through internal controls, monitoring and evaluation systems – shall implement, assess, document and report the impact of its CSR activities.
- c) Records relating to CSR activities and its expenditure shall be meticulously maintained and shall be submitted for reporting and auditing purposes.

- d) The implementing agencies other than the Company, if any involved, shall also be subjected to financial audit.
- e) The Company may appoint independent external consultants for carrying out such audits.

16. Amendments

CSR policies of the Company may be reviewed and amended from time to time within the purview of Government directives.

Place: Kolar
Date: 13th Dec 2019



Ko Tanaka
MANAGING DIRECTOR

ANNEXURE - I

CSR Activities Listed in Schedule VII of the Companies Act, 2013

CSR shall focus on social, economic and environmental impact rather than mere output and outcome. Activities which are ad hoc and philanthropic in nature shall be avoided. Various activities that can be undertaken in general under CSR are outlined below:

1. Eradicating hunger, poverty and malnutrition, promoting healthcare including preventive healthcare and sanitation and making available safe drinking water;
2. Promoting education, including special education and employment enhancing vocation skills especially among children, woman, 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 of quality of soil, air and water;
5. Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up of public libraries; promotion and development of traditional arts and handicrafts;
6. Measures for the benefit of armed forces veterans, war widows and their dependents;
7. Training to promote rural sports, nationally recognized sports, and Paralympics sports and Olympic sports;
8. Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Governments for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
9. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government,
10. Rural development projects.
11. Slum area development

ANNEXURE - II

Format for the annual report on CSR activities to be included in the Board's Report
(As per the CSR Rules, 2014)

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. The Composition of the CSR Committee. Average net profit of the company for last three financial years Prescribed CSR Expenditure (two per cent. Of the amount as in item 3 above). 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:-

1	2	3	4	5	6	7	8
S. No	CSR project/ activity identified	Sector in which the Project is covered	Projects/ Programmes 1. Local area/others 2. Specify the state /district where project/programme was undertaken	Amount outlay (budget) project/ programme wise	Amount spent on the project/ programme Subheads: 1. Direct expenditure on project or programmes 2. Overheads:	Cumulative spend upto to the reporting period.	Amount spent: Direct/through implementing agency *
1							
2							
3							
Total							

*Give details of implementing agency:

2. 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.

3. 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.

Signature (CEO or MD or Director)	Signature (Chairman of CSR Committee)
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