

BNP PARIBAS SIPL CSR POLICY



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1. ABOUT BNP PARIBAS INDIA

BNP Paribas has been in India since 1860 and is among the leading international financial institutions providing a wide range of financial services covering corporate & institutional banking, and personal investment services for individuals.

BNP Paribas is the second oldest foreign bank in India and has 5 Corporate and Institutional Bank branches in Mumbai, Delhi, Bengaluru, Chennai and Pune that offer the entire range of corporate and institutional banking products and services, covering flow banking (transaction banking), financing, hedging, global markets, derivatives and investments.

2. ABOUT BNP PARIBAS SECURITIES INDIA PRIVATE LIMITED

BNP Paribas Securities India Private Limited (“SIPL”) is a full service Equities and Currency Derivatives brokerage and is a leading player across Cash Equities, Equity Derivatives Execution and Clearing.



3. APPROACH TO CSR

BNP Paribas’ responsibility policy has been built on 4 pillars, with 12 commitments. Formally launched in 2001, and reinforced in 2010, BNP Paribas Group’s Corporate Social Responsibility is rooted in four pillars, in which actions as a responsible Bank take concrete form.

All of the Group’s business lines, networks, subsidiaries and countries apply this policy, using the same structure while adapting it to their specific characteristics.



BNP Paribas companies in India have established BNP Paribas India Foundation as the common and collective social arm of the group to help amplify the philanthropic and CSR footprint. The India Foundation will help align the overall group CSR vision and philosophy and operationalize, coordinate, monitor and evaluate the implementation of the CSR vision by engaging with various internal and external stakeholders.

4. TITLE AND APPLICABILITY

This CSR Policy has been prepared 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, programmes, and activities undertaken by BNP Paribas SIPL.

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



5. CSR PROGRAMME AREAS - INDIA

The programmatic areas are aligned with those of the BNP Paribas India Foundation. They are also in keeping with activities listed in schedule VII of Section 135 of the Companies Act 2013. BNP Paribas SIPL through its CSR activities will support program/projects and activities from among the following thematic areas of action:

5.1. EDUCATION

Support schooling for underprivileged & special children

- Strengthen access of primary and secondary education
- Promote schools for differently abled children

Youth & Women

- Support Financial Inclusion / literacy programs
- Support institutes, non-formal vocational programs that create livelihood opportunities;
- Facilitate self-help groups, enhance vocational skill training and promote entrepreneurship.

5.2. ARTS & CULTURE

Native Arts & Crafts

- Preservation & conservation of local forms of Arts, Crafts, & Language
- Preservation of native traditional Dance, Music & Musical instruments;

Support Artists & Artisans & Arthouses

- Promotion of literary, visual and performing arts and support book publications / cultural institutions.
- Support programs that help artists & artisans involved in sustaining, restoring or reviving arts / crafts forms.

5.3. ENVIRONMENT

Combat Climate Change

- Support programs to combat Climate Change and improve bio-diversity
- Aid initiatives that help preservation of landscapes, waterbodies and the resultant bio-diversity.

Renewable resources & Water Conservation

- Support projects related to Solar, Rain Water harvesting, Wind power – and any such renewable / sustainable energy sources.
- Promote initiatives that aims at building / reviving water bodies.

Awareness Campaigns

- Community projects
- Sustainable / Green initiatives

5.4. RELIEF & RESCUE

Natural Calamity, Pandemic or Epedemic

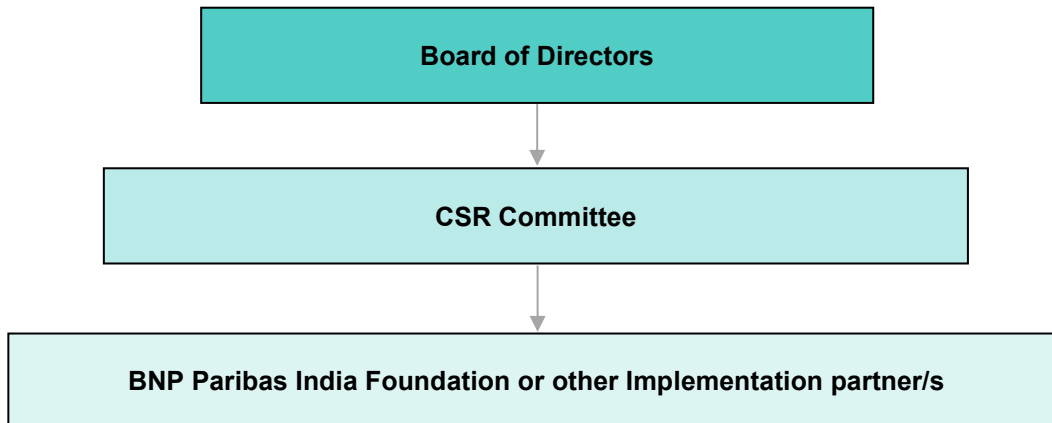
- Support people affected due to natural calamities such as flood, earthquake etc.
- Help rehabilitation of affected population esp. children, women & their families.
- Support Hospitals, Migrants & marginalized community, Women/Girls & the Youth and aid digital education.

5.5. OTHERS

Contribution to Prime Minister's National Relief Fund or any other fund set up by the Central Government or any other areas as may be prescribed under Schedule VII of the Companies Act, 2013.



6. GOVERNANCE STRUCTURE



7. RESPONSIBILITY OF CSR COMMITTEE MEMBERS

As per the provisions of the Companies Act 2013 and the Rules of the Act, the Board of Directors of BNP Paribas SIPL shall:

- After taking into account, the recommendations made by the CSR Committee, approve the CSR Policy and the Annual Action Plan for the company and disclose contents of such Policy in its report and place it on the company's website, if any, in such manner as may be prescribed.
- Ensure that the CSR activities are in keeping with its Corporate Social Responsibility Policy.
- Ensure that BNP Paribas SIPL spends, in every financial year, at least 2% of the average net profits of the company made during the three immediately preceding financial years, in pursuance of its CSR Policy.
- If BNP Paribas SIPL fails to spend such amount, the Board of Directors shall ensure the unspent amount is transferred to the Unspent CSR Account and spent in pursuance of CSR policy where it pertains to an 'ongoing project' OR transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
- The Board of Directors shall have the power to make any change(s) in the constitution of the CSR Committee.

8. COMPOSITION OF CSR COMMITTEE

The composition of the CSR Committee of the BNP Paribas SIPL is as under:

#	Name	Designation/Category
1	Mr. Abhiram Eleswarapu, CEO & Director	Committee Member - Chairperson
2	Mr Zoher Khambati, Director	Committee Member
3	Ms. Karen Claude D'Souza, Director (Compliance) & Company Secretary	Permanent Invitee
4	Mr. Sanjay Kumar Singh, CEO – BNP Paribas India	Permanent Invitee
5	Ms. Amisha Dhutia, Head - BNP Paribas India Foundation	Permanent Invitee + CSR Coordinator

9. ROLES OF THE CSR COMMITTEE



As defined under the provisions of the Companies Act 2013, the CSR Committee shall:

- Prepare, revise and modify the CSR Policy for BNP Paribas SIPL and place the same with the Board of Directors for their approval.
- Develop an Annual Action Plan which will cover the following items –
 - List of CSR projects or programmes
 - Manner of execution of such projects or programmes
 - Modalities for utilisation of funds and implementation schedules
 - Monitoring and reporting mechanism for the project or programmes
 - Details of need and impact assessments, if any
- Provide guidelines for selection of projects/programmes & implementing partners and ensure that the programmes/projects undertaken are aligned with its approved CSR policy and Schedule VII of the Section 135, Companies Act 2013.
- Review and approve annual budgets with respect to CSR programmes.
- Develop a framework for monitoring of the CSR projects/programmes.
- Assist the Board of Directors in preparation of the Annual CSR report as required to be filed under the provisions of the Companies Act 2013/CSR Rules;
- Review the findings and recommendations regarding CSR initiatives from any investigation or audit conducted by regulatory agencies or external auditors or consultants;
- In case BNP Paribas SIPL is not able to spend the stipulated 2% of the average net profits of the preceding three financial years or any part thereof, the CSR Committee shall provide the reasons for not spending the amount to the Board of Directors and identify 'ongoing projects' towards which such unspent is to be allocated or identify the National CSR Funds where such unspent amounts are to be contributed;
- Respond to any query, observation or clarification sought by the Ministry of Corporate Affairs or any other regulatory authority with regard to BNP Paribas SIPL's CSR initiatives;
- In case the company is not required to establish a CSR Committee as per Section 135 of the Companies Act, 2013, the responsibilities of the CSR Committee shall be subsumed by the Board of Directors.

10. CSR BUDGET

The CSR Committee shall recommend the amount of expenditure to be incurred on the CSR activities to be undertaken by BNP Paribas SIPL as specified in Schedule VII of the Companies Act 2013.

In case of any surplus arising out of CSR projects, the same shall not form part of business profits of BNP Paribas SIPL.

11. IMPLEMENTATION

BNP Paribas SIPL shall implement its CSR programmes/projects:

- Through BNP Paribas India Foundation; or
- Through an Implementation Partner that may be a public charitable trust or a society registered under applicable Act or a Company registered under Section 8 of the Companies Act 2013 (with a valid CSR registration number from the Ministry of Corporate Affairs)

BNP Paribas SIPL with the help of BNP Paribas India Foundation shall formulate criteria and procedure for selection, screening and due diligence of its implementing partners.

12. MONITORING

BNP Paribas SIPL shall institute a monitoring and review mechanism to monitor its CSR project/program. The monitoring mechanisms shall include:

- Clear targets, timelines and measurable indicators, wherever possible
- A progress monitoring and reporting framework that is aligned with the requirements of Section 135 of the Companies Act 2013 and the CSR Rules

13. REPORTING

The CSR Committee shall monitor progress of CSR projects and report to Board of Directors. BNP Paribas SIPL will report CSR performance in its Annual Report as per the structure and format prescribed in the notified CSR Rules.

Further, the Chief Financial Officer/ Head of Finance of the Company shall issue a certificate to the effect that the funds disbursed towards CSR have been utilized for the relevant purposes and in the manner as approved by the Board of Directors.

14. VALIDITY OF CSR POLICY

Any modification / amendment in the CSR Policy shall be placed and approved by the CSR Committee.

15. PROJECTS

Sl. No	Project title	Item from the list of activities in Schedule VII to the Act.	Local area (Yes/No)	Location of the project		Mode of Implementation - Direct (Yes/No)	Name of implementing partner
				State.	District.		
1	BNP Paribas' group CSR Programme	Education, Arts & Culture, Environment and Relief & Rescue	Yes	Pan India		No	BNP Paribas India Foundation



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