RELIANCE COMMERCIAL FINANCE LIMITED

POLICY ON CORPORATE SOCIAL RESPONSIBILITY

1. SCOPE AND PURPOSE

The Companies Act, 2013 has brought about a change in the understanding of the term "Corporate Social Responsibility" (CSR) as known to the corporate world by converting it from voluntary charity activities to mandated responsibilities. Section 135 of the Act prescribes that in case of companies meeting the specified criteria, a CSR policy be formulated in accordance with Schedule VII of the Act and that the CSR Committee of the Board be responsible for framing the policy, finalizing the amount to be spent on CSR and monitoring and implementing the policy as per the Act.

The CSR Policy of RCFL sets out the framework guiding the companies CSR activities and also ensures compliance with section 135 of the Act.

The Reliance Group CSR Policy, in place, is an overarching policy applicable to the entire Reliance Group including all group companies, business divisions and business units. RCFL being a part of the Reliance Group is committed to adhering to the Reliance Group CSR policy placed as Annexure A to this Policy document.

The CSR expenditure will include all expenditure incurred by the Company on CSR Programmes undertaken in accordance with the approved CSR Plan as per the Reliance Group CSR policy. Surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company.

2. IMPLEMENTATION OF CSR ACTIVITIES

The CSR Committee would consider and approve the projects or programmes that the Company should undertake as CSR activities in accordance with the Reliance Group CSR Policy.

3. GOVERNANCE

The Company shall follow a structured governance procedure to monitor CSR activities. The Board of Directors governs the CSR Policy. In terms of the Companies Act, 2013 the Board of Directors have constituted the Corporate Social Responsibility Committee ('CSR Committee') to formulate and recommend to the Board of Directors the CSR Policy indicating activities to be undertaken as specified in Schedule VII and the amount of expenditure for the CSR activities. The CSR Committee shall monitor the CSR Policy of the Company from time to time. The Board of Directors shall review the progress of CSR activities annually.

The CSR Policy issued pursuant to the Act has been recommended by the CSR Committee of the Board of Directors and approved by the Board of Directors.

Amendments from time to time to the CSR Policy, if any, shall be considered by the Board of Directors based on the recommendations of the CSR Committee.

4. DISCLOSURE

The Company shall include in its annual report, commencing with the annual report for the year ending March 31, 2017, the disclosures as prescribed under Companies Act, 2013 and the rules as amended from time to time.

The above information shall also be displayed on the Company's website.

Annexure A: Reliance Group CSR Policy

Annexure B: CSR activity for the F.Y 2016-17

Annexure A

Reliance Group CSR Policy

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Introduction

- **1.1** Reliance Group is among India's leading business houses, having a dominant presence across a wide array of high-growth consumers-facing businesses ranging from telecom and financial services to infrastructure and healthcare, touching the life of almost every Indian.
- **1.2** Through its various consumer-facing businesses, the group provides a robust platform to every Indian to realise his potential and shape the destiny through its state-of-the-art products and services.
- **1.3** Our constant endeavour has been to provide an enhanced customer experience and achieve customer satisfaction by upscaling the productivity of the enterprises and individuals we serve.

We as a corporate entity envisage to nourish and sustain the ecosystems on which we operate by aiming for growth through sustainable development. The group positively influences the lives of one in every 6 young and aspiring Indians-every single day across 600000 villages and 24000 towns.

1.4 At Reliance Group all our efforts are focused towards two goals: building a great enterprise for its stakeholders and a great future for our country.

CSR Policy

- 2.1 Guiding Charter:
 - 1. We are committed to ensuring ethical business practices, honouring in spirit the legal norms of the country we operate in and transparency in all our activities to be a good corporate citizen.
 - 2. We shall strive to preserve and uphold natural resources and reduce the environmental impact of our products and services throughout their lifecycle in order to be a responsible corporate citizen.
 - 3. We believe in creating synergies with our partners in growth and success: the communities. We are committed to augment the overall economic and social development of local communities by discharging our social responsibilities in a sustainable manner.
 - 4. We uphold our commitment to our customers by making our products and services greener and within reach of the common masses, leading to maximization of customer satisfaction and enriching quality of life.
 - 5. We are dedicated to promote and invest resources for joint learning in the areas of quality improvement, productivity enhancement, and implementation of greener and advanced technology and processes across our supply chain for the benefit of the larger society and the business. Thus, we wish to build strong partnerships with suppliers and work with them to fulfil our social responsibilities together.
 - 6. We uphold our commitment to serve and partner with government and quasigovernment agencies in nation-building.
 - 7. We shall respect the varied traditions and cultures of our country and are committed to preserve and document history and art for the benefit of present and future generations.
 - 8. We believe and promote an open corporate culture that values teamwork while honouring individual commitment and mutual trust. We do not accept or tolerate the use of child labour at any stage of the supply chain, gender discrimination, disability, bias on the basis of caste or religion, and violation of human rights.
 - 9. We aim to meet the expectations of shareholders and investors by maximizing the group company's value and active disclosure.
 - 10. We shall nurture the silvers and groom the youth of our country in response to various global and local concerns.
 - 11. We will avidly pursue research and development along with our partners to meet changing global requirements by redefining our processes, products and services.

2.2 Objective:

The policy document is an attempt to articulate the group's Social Responsibility. The framework enables business heads to put in place policies and practices in line with this policy.

2.3 Scope:

- 2.3.1 The social policy is an overarching policy applicable to the entire Reliance Group including all group companies, business divisions and business units.
- 2.3.2 The policy conforms to the business strategy and will apply to all employees across the bandwidth of group companies. Their commitment and involvement in putting the policy into action would support us in achieving our principles and mandate, and adhering to global standards.
- 2.3.3 The social policy document is an attempt to showcase the linkage of our social objectives with business strategy.
- 2.3.4 The policy will also assist and promote our suppliers and vendors in adhering to its imperatives.

2.4 The CSR Approach:

At Reliance Group, the approach is to interweave social responsibility into the company's mainstream business functions through translating commitments into policies, which not only drive all employees but influence and mobilize stakeholders, especially partners and suppliers, to embrace responsible business practices in their respective spheres of action.

The policy affirms business objectives and strategy along with our commitment to preserve natural resources and augment the growth and development of employees and families, the communities we operate in, suppliers/vendors, and our investors.

Through the social policy manual, the Group seeks to engage with all the stakeholders, using it as a reference or guideline for all stakeholders and practitioners.

We follow an integrated multi-stakeholder approach covering all social, environmental and economic aspects.

The commitments of Reliance Group under the gamut of CSR, based on the CSR Charter, are as follows:

2.4.1 Environment:

The guiding line for the environment is the 5Rs: Reduce, Reuse, Recycle, Renew and Respect. The imperative is to use natural resources efficiently to leave a minimal carbon footprint and impact on biodiversity.

The Group strives to develop and promote processes and newer technologies to make all our products and services environmentally responsible.

Employees, the supply chain and other stakeholders are sensitized through personal interactions and other channels of effective communication. Initiatives can be measured through resource savings in all cases. The Group aims to engage with government and non-government agencies to promote conservation.

2.4.2 Community Development:

The community is an integral part of the business environment. Business intervention can have a positive or negative effect on a community. The need assessment and engagement process is critical to the system and demands focus on a case-to-case basis, which includes setting up strong ties with the community and its leaders.

Factors that affect the local community could range from education, health and hygiene, to displacement, livelihood and environmental concerns. There could be a combination of some of these factors or all of them.

The Pareto of the factors is to be analyzed and resources allocated accordingly. Reach and penetration could be enhanced by roping in community leaders and other agencies working in the area with a specialization on the usage area.

The objective is to augment overall economic and social development of local communities by discharging our social responsibilities in a sustainable manner.

2.4.3 Health and Safety:

Health and Safety are of universal concern across the spectrum of the community. As a Group, we are committed to comply with legal norms as well as voluntarily go beyond the compliance to minimize the impact of our businesses across our various stakeholders.

We are committed to provide all possible support to create awareness among our stakeholders within office premises as well as across boundaries.

Reliance Group will systematically outline Health and Safety as defined under the OSHAS-18001 and other compliances.

Health concerns vary across the urban and rural divide. Issues include lack of availability to primary healthcare and infant mortality owing to low awareness on health and hygiene.

A multidimensional approach that considers the needs of an area could lead to an effective plan to address all issues in consultation with the local administration, community workers and NGOs working in the area.

2.4.4 Education

Education is the basic tool to bring development to an area and its population. We aim to create an aware pool of human resource both within and across our area of operations.

We are committed to bridging the digital divide between the 'haves' and the 'have nots'.

Exposure to technology along with a sustainable education model could be strengthened through partnership with government and quasi-government agencies.

The CSR gamut is covered by these broad areas but not limited to them.

Annexure B

The voluntary CSR activities for the F.Y 2016-17 along with the schedule is given below:

Sr. No.	CSR program	Project	Referenc e Sr. No.	Implementation Schedule				Amount (Rs.)
			of Sch VII	Q1	Q2	Q3	Q4	
1	Promoting Education and Employment enhancement	CSR Activity at Faridabad and Gujarat Centre	(i)			4,84,875/-		4,84,875/-
2	Promoting Education and Employment enhancement	CSR Activity at Faridabad and Gujarat Centre	(i)				2,42,437/-	2,42,437/-
3	Imparting Education to under privileged Children for Mission Education Programme	Smile Foundation	(i)				8,00,000/-	8,00,000/-