

# C.S.R Policy

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SBM OFFSHORE INDIA PRIVATE LIMITED

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SOLITAIRE, NO 139/26, 3RD FLOOR, AMARJYOTHI LAYOUT KORMANGALA INTERMEDIATE  
RING ROAD, DOMLUR BANGALORE 560071



## CONCEPT

### SHORT TITLE & APPLICABILITY

This policy referred as “SBM Offshore India CSR Policy”, encompasses the company’s philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for carrying out socially useful activities / projects and programs for welfare & sustainability and development of community at large, preferably at local area and in its areas of operations

This policy shall apply to all CSR projects, activities and initiatives taken-up at all locations of SBM Offshore India Private Limited, or any other location as may be decided by the management of SBM Offshore India Private Limited for the benefit of different segments of the society.

SBM Offshore India complies further with SBM Offshore’s ESG/CSR related policies, i.e. HSE & Human Rights, Sustainability, Diversity & Inclusion, Anti-Bribery & Corruption policies and the Code of Conduct

## VISION STATEMENT & OBJECTIVES

### VISION

“To commit to value-creation for stakeholders, including local communities by taking-up activities and initiatives for sustainable growth with environmental and social concern”.

### OBJECTIVES

To ensure an increased commitment at all levels in the organization, operate its business in an economically, socially & environmentally sustainable manner, while recognizing the interests of all its stakeholders.

To directly or indirectly take up programs that benefit the communities in & around its offices and results, over a period of time, in enhancing the quality of life & economic well-being of the local population.

To generate through its CSR initiatives, a community goodwill and help reinforce a positive & socially responsible image of SBM Offshore India Private Limited as a corporate entity.

## CSR COMMITTEE



**SBM Offshore India Private Limited** shall have a CSR Committee of Board consisting of three (3) or more directors as per section 135 of the Companies Act, 2013 and rules and enactments thereof.

For carrying out the CSR Projects / Activities, the Committees will meet as per the following schedules :-

CSR Committee of the Board: Twice every year.

#### AREAS OF CSR ACTIVITIES

- i. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh 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 & the differently abled and livelihood enhancement projects
- iii. Promoting access to clean & affordable energy, initiatives that reduce and/ or offset GHG emissions and projects that reduce, reuse and recycle (plastic) waste
- iv. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups
- v. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, conservation of natural resources and maintaining quality of soil, air & water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga
- vi. Protection of national heritage, art & culture including restoration of buildings, sites of historical importance and works of art; setting-up public libraries, promotion and development of traditional arts and handicrafts
- vii. Measures for the benefit of the armed forces veterans, war widows and their dependents
- viii. Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympic sports

- ix. Contribution to the Prime Minister's National Relief fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Caste, Scheduled Tribes, other backward classes, minorities and women
  - a. Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and
  - b. contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research(CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Biotechnology (DBT), Department of Science and Technology(DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);
- x. Rural development projects
- xi. 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
- xii. Disaster management, including relief, rehabilitation and reconstruction activities
- xiii. To support any causes or activities in relation with the occupational safety, climate change and energy transition

## **FUNDING & ALLOCATION**

1. For achieving CSR objectives, SBM Offshore India Private Limited will allocate 2% of the average net profits of the Company made during the three immediately preceding financial years, as its annual budget for the current year.
2. The annual budget allocated on a yearly basis will be utilized to carryout activities / projects relating to the CSR Areas as per the CSR Plan for the year.



3. If the Company fails to spend the allocated CSR amount, the Board shall in its report made under clause(o) of sub- section (3) of section 134 of Companies Act,2013, specify the reasons for not spending the amount.

## IMPLEMENTATION

1. CSR programs will be undertaken by officers designated by SBM Offshore India Private Limited to the best possible extent within the defined ambit of the above identified heads.
2. The time period/duration over which a particular program will spread, will depend on its nature, extent of coverage and the intended impact of the program.
3. Programs which involve considerable financial commitment and are undertaken on a time frame of 2-5 years, will be considered as 'flagship programs' and accorded enhanced significance.
4. By and large, preference will be given for the CSR programs to be executed in and around the areas adjoining SBM Offshore India Complexes /offices/ Work Centers, including Corporate Office.
5. Whenever possible, initiatives of State Governments, District Administration, Local Administration as well as Central Government Departments Agencies, Self-Help Groups, etc., would be dovetailed and synergized with the initiatives of by SBM Offshore India.
6. Project activities identified under CSR are to be implemented by specialized agencies, which could include - Voluntary Organizations (VOs) formal or informal Elected local bodies such as Panchayats, Institutes/Academic Institutions, Trusts, Self Help Groups, Govt/Semi Govt/Autonomous organizations, Mahila Mandals, Professional Consultancy organization or through any other means as may be decided by the management of SBM Offshore India.
7. The process for implementation of CSR programs will involve the following steps:
  - a. Identification of programs by means of any of the following :
    - Need identification studies by professional institutions/agencies.
    - Internal need assessment by cross-functional team at the local level
    - Receipt of proposals/requests from District Administration/local Govt. etc.



- Discussions and request with local representatives/Civic bodies / Citizen's forums / Voluntary Organizations.
  - Proposals as identified by the company in any other manner.
- b. Project based approach: SBM Corporate Office / work centers will follow a project based accountability approach to stress on the long term sustainability of CSR projects, where its action plan will be distinguished as :
- Short term : up to 1 year
  - Middle Term : 1 year to 2 years
  - Long Term : 2 years and above

While identifying long term programs, all efforts be made to the extent possible to define the following:

- a. Program objectives.
- b. Baseline survey – It would give the basis on which the outcome of the program would be measured.
- c. Implementation schedules- Timelines for milestones of the program will need to be prescribed.
- d. Responsibilities and authorities.
- e. Major results expected and measurable outcome.
- f. Evaluation of the project implementation/ completion.

## POWERS FOR APPROVAL

CSR programs as may be identified by Management will be required to be put up to the CSR Committee of the Board at the beginning of each financial year with due recommendations and the Committee will make proposal for the approval of the Board of Directors.

## EXECUTING AGENCY/PARTNERS

SBM Offshore India will seek to identify suitable programs for implementation in line with the CSR objectives of the Company and benefit the stakeholders and the community for which those programs are intended.

These works could be done through:

1. Registered Trust / Registered Society
2. Company established by the Company or its holding or subsidiary or associate Company under Section 8 of Company's Act.
3. Collaboration with other CPSEs / Companies
4. Community based organizations whether formal or informal



5. Elected local bodies such as Panchayats
6. Voluntary Agencies (NGOs)
7. Institutes/ Academic Organizations
8. Trusts, Missions
9. Self-help Groups
10. Government, Semi-Government and autonomous Organizations
11. Standing Conference of Public Enterprises (SCOPE)
12. Mahila Mandals/ Samitis
13. Contracted agencies for civil works
14. Professional Consultancy Organizations
15. Others

## MONITORING & FEEDBACK

To ensure effective implementation of the CSR programs undertaken at each Complex / Division / Office a monitoring mechanism will be put in place.

The progress of CSR programs under implementation will be reported to Corporate Office on a semi annual basis.

The CSR department at the Corporate Office will conduct impact assessment studies on a periodic basis, if necessary through independent professional third parties/professional institutions, especially on the strategic and high value programs.

SBM Offshore India Corporate Office/ Work Centers will also obtain feedback from beneficiaries about the programs.

Appropriate documentation of the SBM Offshore India CSR Policy, annual CSR activities, executing partners and expenditure entailed will be undertaken on a regular basis and the same will be made available to Corporate Office.

CSR Policy and initiatives of the Company will also be reported in the Annual Report and the official website of the Company if deemed necessary.

## ROLES & RESPONSIBILITIES

While each SBM Offshore India Private Limited employee has a responsibility to abide by the fundamental principles outlined in this document, specific responsibility for implementation is assigned as follows:



## **1. LINE MANAGEMENT**

Line managers are responsible for CSR implementation and for communicating the basic principles of this Corporate Directive to all employees in their units.

## **2. CSR COMMITTEE**

Corporate CSR Committee is responsible for developing CSR Plan and reporting guidelines, monitoring internal performance, and for providing general support to the Business Complexes/Offices.

CSR Committee is also responsible for coordinating external reporting at a corporate level and for developing and maintaining relationships with other companies, institutions and organizations in order to share knowledge and competence.

### **CSR COMMITTEE shall :**

- i. Formulate and recommend CSR Policy of the Company to the Board.
- ii. Recommend the amount of expenditure to be incurred on the CSR activities
- iii. Monitor the CSR Policy of the Company.
- iv. Allocation of budgets for each Division
- v. Finalizing and recommending projects each year for the approval of the Management and Board
- vi. Monitoring implementation & progress of the projects undertaken during the year
- vii. Reviewing of the projects undertaken for the year and the new projects proposed during the course of the year.





# CSR Project

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## CSR Committee

Sl No	Name of the Member/Director	Designation
1	Christophe Rouan	Chairman/Director
2	Brathaban	Director
3	Stephane Michel Jacques Lagrange	Additional Director

## Projects approved by the Board.

### SBM Offshore VATSALYA FY 2021-22

<b>CSR activity year:</b>	FY 2021-22
<b>Duration:</b>	2 years
<b>Project Name:</b>	<b>SBM Offshore India Vatsalya</b> <ul style="list-style-type: none"><li>Round table school – committed to provide a better future for the under privileged children</li></ul>
<b>Budgetary allocation:</b>	INR - 2,522,736.00
<b>Percentage Allocation</b>	100 %

## Project Duration – 2 years

### Roadmap:

1. Provide students access to educational materials including Notebooks, textbooks, printers, UPS, uniforms, etc.
2. Visits on significant days like Children's Day, Earth Day, etc. are a vital part of engaging with the kids on special occasions.
3. Interacting with kids to help them build their social skills and social relationships for future opportunities
4. Providing provisions for nutritious food.
5. Providing the infrastructure development and facility advancement to have best learning facility.
6. Providing amenities such as CCTV and digitally advanced classrooms/ training rooms etc.
7. Identify rank holders and provide future educational support for 10 children.
8. Organizing English spoken sessions for 10 grade children (Current medium of language is Kannada)



**Monitoring Mechanism:**

1. Vendor selection and cost control by inhouse supply chain team
2. Documentation repository - SBM microsite

**Budgetary Plan: Summary**

Activity	Budget Allocated	Budget Plan	Status
Budget Allocated	2,522,736.00		
Educational Aids (Notebooks)		560,000.00	Completed
Bicycle for Class toppers		23,721.60	Completed
Provide better learning conditions (Classroom painting)		500,000.00	Ongoing
Provide safe learning condition (Install CCTV)		400,000.00	
Provide support for nutritional food (Mid-day meals)		1,000,000.00	Ongoing
School Visit on Special occasions		50,000.00	
Total	2,522,736.00	2,533,721.60	



Previous CSR projects completed.

**SBM Offshore VATSALYA FY 2020-21**

<b>CSR activity year:</b>	FY 2020-21
<b>Duration:</b>	2 years
<b>Project Name:</b>	<b>SBM Vatsalya</b> <ul style="list-style-type: none"><li>• Navachetana – Fostering Intellectually Disabled Children.</li></ul>
<b>Budgetary allocation:</b>	INR – 1,290,762.80
<b>Project Status</b>	Completed
<b>Date of Completion</b>	31.03.2023
<b>Percentage Allocation</b>	100 %