

Corporate Social Responsibility Policy

GUNNEBO INDIA PRIVATE LIMITED

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I. Introduction

- I.1 Gunnebo is a global security group which offers effective, innovative security solutions in bank security, cash handling, secure storage, entrance control and security-related services to customers around the globe. In India, Gunnebo is a professional supplier of security & safety products and solutions. With more than 80 years of experience in the Indian market, we have unrivalled expertise in delivering secure storage, site protection, entrance control and fire extinguishing solutions. We protect people, buildings and property, providing security for our clients, their employees and their customers. We employ over 600 people across India.
- I.2 **Gunnebo India Private Limited ('Gunnebo India' or 'Gunnebo')** is a **subsidiary of Gunnebo AB, Sweden**. We are a private unlisted company, incorporated under the provisions of Companies Act, 1956 and having our registered office at Unit No. 102, 1st Floor, Akruiti SMC, LBS Marg, Khopat, Thane (W) - 400601, Maharashtra, India. We have a manufacturing site at Halol and 13 sales & service branches across India. Our Corporate Identity Number (CIN) is **U27106MH1932PTC001874**.
- I.3 Gunnebo India is committed to embracing corporate responsibility, in a manner that helps us create a positive impact on the society and the environment, while being in conformance to our Code of Conduct. Our Code of Conduct lays the foundation for the way in which we do business. In addition, our Core Values support the way we work with our customers and each other. As a responsible business entity, Gunnebo takes pride in being socially inclined and focused on sustained and effective CSR programs. Based on this philosophy, we have formulated our CSR Vision and Mission.

II. Our CSR Philosophy & Code

- II.1 Gunnebo's Code of Conduct lays the foundations for the way in which we do business. The Code, in parallel with our Core Values, is designed to guide our employees to act responsibly and with integrity. We also encourage suppliers, agents, consultants and other business partners to adhere to the principles laid out in the Code.

II.2 The Code identifies four key areas of responsibility:

- **Responsibility towards Employees:** to respect employees and their rights, to offer safe, suitable and non-discriminatory working conditions, and to invest in ongoing skills training to ensure job satisfaction and professional development for each individual.
- **Responsibility towards Customers and Suppliers:** to acquire & retain customers through continuous development and to be able to provide products, services and solutions that meet customers' expectations regarding function, design, quality, safety and environmental care.
- **Responsibility towards Society and the Environment:** to manage the business as a responsible member of society acting according to the laws in the countries where we are present, and to show respect for the protection of internationally proclaimed human rights. We always consider health, safety and environmental issues in our supply chain that contribute to sustainable development.
- **Responsibility towards Shareholders:** to protect the shareholders' investments and strive for a sustainable return.

II.3 Gunnebo ensures that its social responsibility initiatives are connected to its mission and values. It believes in initiatives that are replicable, scalable and sustainable; and strengthens Gunnebo's position as a responsible member of the society.

III. The CSR Vision and Mission

CSR Vision

Gunnebo endeavours to increase its safety blanket from its customers & shareholders to the community at large; and create long lasting social impacts for the well-being of its stakeholders.

CSR Mission Statement

Gunnebo takes responsibility by creating value in the communities where the Group operates. It aims to gain the trust of its stakeholders by being a responsible corporate citizen.

IV. Our focus areas

IV.1 Gunnebo endeavors that all initiatives undertaken by it should have an impact on all key stakeholders.

IV.2 As a responsible corporate, Gunnebo would like to consistently strive for opportunities to meet and better the expectation of our stakeholders wherever practicable, by pursuing the concept of sustainable development. The CSR interventions at Gunnebo will broadly focus on the following:

- Healthcare
- Skill Development
- Environment Sustainability
- Rural & Urban development
- Prime Minister's National Relief Fund, or any eligible Central / State Govt fund
- Disaster management including relief and rehabilitation

IV.3 Gunnebo, through its environmental initiatives, aims to create a positive impact in the society at large. Even in our day-to-day activities, we strive to foster good health, continuously improve our environmental activities, minimize the environmental impact of our business and be economical & efficient with resources¹.

IV.4 To be in coherence with Section 135 of the Companies Act, 2013, and rules made thereunder (**'the Act'**), Gunnebo has re-structured its legacy CSR focus into the 3-4 domains (mentioned below), which would then also fall within the activities approved under the Companies Act, 2013 (and rules made thereunder), as elucidated in the Table below:

#	Focus areas	Sector / Domain	List of possible activities	Conformance to Schedule VII of Sec 135
1.	Disaster management	Educating the public on 'promotion of safety'	- Conduct awareness & sensitization sessions on 'promotion of safety norms'(including fire and building safety management practices & protocols) in schools &	- Conforms to item (xii)

¹

#	Focus areas	Sector / Domain	List of possible activities	Conformance to Schedule VII of Sec 135
			colleges, hospitals, etc. - Preparation and dissemination of print, audio & visual media on safety awareness & management	- Conforms to item (xii)
2.	Healthcare	Promoting healthcare including preventive health care	- Support to public healthcare systems	- Conforms to item (i)
3.	Skill Development	Vocational skills & trainings	- Livelihood enhancing vocational skills projects for women, youth and other key stakeholders - Supporting skill-based training institutions	- Conforms to item (ii) - Conforms to item (ii)
4.	Environment Sustainability	Natural Resource Management	- Using alternate energy sources - Tree plantation drives in schools, villages and manufacturing units - Promoting Biodiversity	- Conforms to item (iv) - Conforms to item (iv) - Conforms to item (iv)
5.	Rural & Urban development	<ul style="list-style-type: none"> • Rural infrastructure • Water-Sanitation 	<ul style="list-style-type: none"> - Contributing and supplementing key Government schemes - Preventive healthcare & sanitation programmes 	<ul style="list-style-type: none"> - Conforms to items (i) and (iii) - Conforms to items (i) and (iii)
6.	Prime Minister's National Relief Fund, or any eligible Central / State Govt fund	<ul style="list-style-type: none"> • Relief & Assistance 	- Grants & Donations for the purpose of disaster & relief response	- Conforms to item (viii)

V. Implementation

- V.1 The CSR funds and thereby the activities intended to be implemented by Gunnebo, would primarily be channelized, and executed either directly or through
- a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company, or
 - a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
 - any entity established under an Act of Parliament or a State legislature; or
 - a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities; or
 - any other mode as specified by the CSR Rules, amendments and clarifications / notifications thereof.
- V.2 Gunnebo shall specify the modalities of utilization of funds, monitoring and reporting mechanism for all its programs and projects.
- V.3 Gunnebo shall conduct its CSR activities, at all times, as per the CSR policy and other guidance provided from by the CSR Committee and shall not amend its charter or any of its practices which are contrary to the CSR policy and instructions and guidance provided by the CSR Committee, unless a prior written approval of the CSR Committee is obtained.
- V.4 As and when required, a CSR team shall be set up for facilitating implementation of the CSR policy and programs. The responsibility of this team (working under the CFO's oversight) shall be to act as a central coordinating point for CSR implementation in the Corporate, performing the following roles:
- Design / review projects to be in compliance with the section 135 of the Companies Act and the CSR Rules and CSR policy
 - Identify and conduct due-diligence of external partners (wherever required)

- Plan annual budgets for CSR projects in coordination with other partners departments and develop proposals for consideration of the CSR Committee
- Interface with various departments within the Company to ensure effective implementation
- Report to the CSR Committee on the progress of CSR projects and status of CSR expenditure on a quarterly basis; along with documentation and reporting of all CSR activities of the Company in pursuit of the CSR policy

V.5 To implement CSR activities, the CSR team will receive requests / solicit requests - for funding of projects and subsequently evaluate proposals received (for adherence to its focus areas) and recommend them to CSR Committee for its approval. Once approved by the Committee, Gunnebo then shall decide on the modalities of funding and implementation of each such activity in accordance with the guidelines and the policy.

VI. Governance mechanisms : the Board and the CSR Committee

VI.1 Gunnebo, through its board of directors (**'Board'**) or any committee constituted for the purposes of CSR activities (**'CSR Committee'**), will decide on the locations for CSR activities. While the focus of CSR efforts will be in the local areas and areas around it where Gunnebo operates, it may also undertake projects where societal needs are high or in special situations (such as in the case of natural disasters etc).

VI.2 The CSR policy and the constitution shall be monitored through CSR Committee which has been constituted by the Board in accordance with the provisions of the Act. In broad terms, the summary role of board of directors and CSR Committee (as specified under the CSR rules) is as under:

Board

CSR Committee

- Form a CSR Committee

- Formulate and recommend a

- Approve the CSR policy
 - Ensure implementation of the activities under CSR
 - Ensure 2% spend/funds so disbursed have been utilised for the purposes and in the manner as approved by it
 -
- CSR policy to the board of directors, including any modification thereto
 - Recommend activities and the amount of expenditure to be incurred
 - Prepare modalities of the execution and Monitoring the approved activities and spends
 - Recommend changes in the CSR policy to conform to the requirements of the law as amended from time to time
 - Provide details of need and impact assessment of programs, if any

VI.3 **Charter for the CSR Committee:** A CSR Committee has been constituted for adhering to the requirements of Section 135 of the Companies Act, 2013. The committee shall have four members: **Mr. Stefan Syrén (Chairman), Mr. Helge Nielsen (Director), Mr. Sabyasachi Sengupta (Country Manager & Managing Director) and Mr. Nitin Patil (Director).** Mr. Helge Nielsen shall preside over the meetings as the Chairman of the CSR Committee.

VI.4 The **purpose of the CSR Committee** (the “Committee”) of the Board of Directors (the “Board”) of Gunnebo India Private Limited (“Gunnebo”) shall be to assist the Board and the Company in fulfilling its Corporate Social Responsibility (“CSR”) obligations under Section 135 of the Companies Act, 2013.

VI.5 **Composition:** The Committee shall be appointed by and will serve at the discretion of the Board. The Committee shall consist of no fewer than three (3) members. The members of the Committee shall meet as provided in this Charter.

VI.6 **Meetings and Quorum:**

- The Corporate Social Responsibility Committee shall meet periodically for oversight of the Corporate Social Responsibility activities.

- The quorum for the CSR Committee Meeting shall be two-third of its total strength (any fraction contained in that two-third be rounded off as one) i.e. two members.

VI.7 Roles & Responsibility: The Committee shall annually review and approve the CSR Policy and associated frameworks, processes and practices of the Company.

- it shall identify the areas of CSR activities and recommend the amount of expenditure to be incurred by Gunnebo on such activities
- it shall ensure that the Gunnebo is taking the appropriate measures to implement the identified CSR projects successfully
- it shall ensure that activities, even if they fall within the ambit of CSR activities listed under the Act, but are done by Gunnebo in normal course of its business, shall not be considered as a CSR activity.
- it shall review the performance of its implementing partners on a periodic basis
- it shall regularly report to the Board (as a structured agenda point during the Board meetings)
- it shall review and reassess the adequacy of this Charter annually and recommend any proposed changes to the Board for approval
- it shall also have authority to obtain advice and assistance from internal or external legal, accounting or other advisors

VI.8 The CSR policy shall be placed on Gunnebo India's website.

VII. CSR funds & expenditure

VII.1 The Board should ensure that at least 2% of average net profits of the last three years is spent on CSR initiatives undertaken by Gunnebo. In case at least 2% of average net profits of the last three years are not spent in a financial year, reasons for the same to be specified in the Board's report.

VII.2 Any surpluses generated out of CSR activities shall "not" form part of the business profits of Gunnebo. Any such surplus shall be spent towards prescribed activities under schedule VII and would be transferred to a fund specified in Schedule VII in line with the requirements of the CSR Rules and amendments thereof.

VII.3 CSR expenditure will include all expenditure, direct and indirect, incurred by Gunnebo on CSR activities, including the expenditure undertaken on the same, either directly or indirectly through implementing agencies, in accordance with its approved CSR policy. Any expense on an item not in conformity or not in line with the said activities shall not form part of the CSR expenditure.

VII.4 Gunnebo may build capacity of its own personnel as well as implementing agencies, if any, to carry out CSR, but such expenditure shall not exceed 5% of total CSR expenditure in one FY.

VII.5 Any unspent amount shall be transferred to a fund specified in Schedule VII at the end of a financial year or as specified by the CSR Rules, amendments and clarifications / notifications thereof.

VII.6 Any capital asset purchased as part of a program shall be transferred to either to a Registered Public Trust / Registered Society / Section 8 Company having a CSR registration number or to the beneficiaries of the project or to a public authority or as specified by the CSR Rules, amendments and clarifications / notifications thereof.

VIII. Monitoring & Reporting

VIII.1 As a process guideline, the CSR Projects shall endeavour to address societal & community needs, have clearly articulated objectives (to be substantiated through a baseline); and have specified timelines & measurable parameters (KPIs) to assess the progress achieved.

VIII.2 The CSR Committee (or a person / team designated by it), shall accordingly outline the expected outcome and milestones that are expected to be achieved in the identified Projects. The designated person/team (as has been suggested above) shall monitor the status of each project on these KPIs and report its findings to the CSR Committee periodically. Accordingly, it shall institute a transparent monitoring and review mechanism for implementation of the CSR projects or programs or activities undertaken pursuant to this policy.

VIII.3 If required as per Act, Gunnebo may also consider adopting an evaluation and audit mechanism, either internally through its internal auditors or even

externally through duly appointed third-party agencies, which will report to the CSR Committee and to the Board on a periodic basis. It may also commission independent mid-term reviews and end-of-project impact assessment studies to validate the project team's findings, as required by the Act.

VIII.4 All details of CSR projects, the project plans & financial allocations - shall be documented and auditable, on a project basis.

VIII.5 The Company's website shall include details of CSR policy, projects and programmes. The Board shall also disclose the composition of CSR Committee and the CSR policy in the Company's website.

VIII.6 The designated person/team shall submit its reports to CSR Committee on a periodic basis, as determined by the Committee. The Committee shall review these reports and shall compile them and submit to the board of directors of Gunnebo on an annual basis with their comments, if any, leading to its adequate disclosure by the Board, in the Director's report as per the requirements of the Act.

VIII.7 The Annual report on CSR shall be included in the Board's report including details as specified in Annexure I and II of the CSR Rules 2014 and the CSR (Amendment) Rules 2021.

IX. Amendments

IX.1 The Board may approve amendments in its CSR policy, subject to recommendations from the CSR Committee.