

Corporate CSR Policy Document (CPD)

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**List of Frequently used abbreviations:**

CEPMC	CBRE Execution & Progress Monitoring Committee
COM	CSR Operational Manual
CPD	CSR Policy Document
CSR	Corporate Social Responsibility
FC(R)A	Foreign Contribution (Regulation) Act
GQL	Good Quality of Living
IP	Implementing Partner
MCA	Ministry of Corporate Affairs
MoU	Memorandum of Understanding
NGO	Non-Governmental Organization
PMF	Project Monitoring Framework
PRA	Participatory Rural Appraisal
RBM	Results Based Management
RFP	Request For Proposals
SDG	Sustainability Development Goals
SMU	Social Mobility Unit
SPI	Social Priority Investments

CBRE South Asia Pvt. Ltd. (herein after: CBRE), the Indian subsidiary of CBRE Group Inc, is committed to Corporate Social Responsibility (CSR) and demonstrates this by contributing to the social development of the communities in the vicinity of its operations.

CBRE is focused on building resilience among the communities which lack access to basic resources and services related to education, health & nutrition. While these three sectors will be universally addressed, CBRE intends its Social Priority Investments (SPI) as part of CSR in the following specific sectors:

While promoting Health & Nutrition, CBRE will focus on:

- 1) Health diagnostic and basic treatment services
- 2) Supplementary nutrition for children
- 3) Health and nutrition awareness

While promoting Education, CBRE will focus on:

- 4) Basic education and learning
- 5) Safe sanitation practices



These specific intervention areas have been identified and defined in line with the United Nation’s (UN) Global Sustainability Development Goals (SDGs).

### Scope and validity of the CSR policy:

The CSR policy applies to the Indian registered entity viz. CBRE South Asia Pvt Ltd of the CBRE group Inc. while falling in line with the sustainability policies of the group.

CBRE’s CSR Policy has been framed in accordance with Section 135 of the Companies Act 2013 and the Rules and amendments framed thereunder. The Policy shall apply to all CSR programs/activities undertaken by CBRE or executed through CBRE Cares, which is the company foundation or through any other Trust/Society/ Section 8 company or implementation partner or any participation in a pooled fund set up by the Government or any other organization.

The CSR Committee may recommend changes to the CSR Policy as may be required from time to time and the same will be reviewed and approved by the Board periodically.

## CSR Governance structure

CBRE understands the importance of a socially mindful governance structure for the dissemination of the responsibilities of CSR. As per the guidelines and amendments of Section 135 of the Companies Act 2013, CBRE has in place a CSR Committee of the Board of Directors to oversee the CSR activities of the firm. The roles and responsibilities of the Board and CSR committee are outlined below

### Role of the Board of Directors:

1. Formation of a CSR committee
2. After taking into account the recommendations made by the CSR Committee, approve the CSR Policy for the Company
3. Ensure its implementation as per the CSR policy document and CSR rules provided in the Companies Act, 2013
4. Disclose the contents of CSR policy in the Board's report and place the same on Company's website
5. Ensure that statutory specified amount is spend by the company on CSR activities as per the requirements of the CSR law and if not then discuss the same in the meeting and undertake the following:
  - a) specify the reason for non-spend in Board's report; and
  - b) transfer the unspent amount to a Fund specified in Schedule VII within a period of 6 months of expiry of financial year, in case there are no ongoing projects  
or  
transfer the unspent amount to a bank account, to be opened in any scheduled bank, within 30 days of the end of the financial year and spend the amount transferred within next three financial years, in case of ongoing project
6. In case of ongoing project, monitor the implementation of project with reference to approved timelines and year wise allocation and making necessary modifications, as required
7. Approve annual action plan recommended by CSR Committee
8. Disclose the composition of the CSR Committee and approved projects on CBRE's website and report on the Annual CSR spend as per the prescribed format

**Role of the CSR Committee of the Board of Directors:** The Committee will include the Chairman of the organization and Directors. Its role would be as under:

1. To formulate and recommend to the Board of Directors, CSR Policy as per activities specified in Schedule VII of the company's Act 2013
2. To recommend the amount of expenditure to be incurred on above activities along with calculation of the same
3. To monitor the policy from time to time
4. Formulate and recommend to the Board, an annual action plan which shall include the following:
  - a) list of approved CSR projects to be undertaken
  - b) manner of execution of projects in compliance with CSR rules
  - c) modalities of utilization of funds and implementation schedules for the projects
  - d) monitoring and reporting mechanism for the projects
  - e) details of need and impact assessment, if any

5. To conduct regular meetings to monitor progress of CSR projects. Minutes of Meetings (MoMs) to be recorded as per internally created format clearly defining the discussion points and key decisions taken

The CSR committee will ensure that any unspent/un-utilized CSR budget of a particular year will not form part of the business profit of the firm and will be set aside in a separate purposive account and/or utilized as per the guidelines under the Company's Act 2013.

The CSR committee will ensure programme/project/activity selection is made only after a detailed assessment of the prospective beneficiaries' standing, and that potential risks have been identified and the relationship is aligned with CBRE's CSR focus.

In addition to the CSR committee, CBRE has constituted an internal execution and monitoring committee – 'CBRE Execution & Progress Monitoring Committee/Team (CEPMC) which will be responsible for the Planning, Selection and Onboarding of Implementing Partner (IP), monitoring and reporting of all CSR related activities. The CEPMC will be exclusive of the CSR Committee of the board

### CSR at CBRE

At CBRE we believe that every life has an equal right to a Good Quality of Living (GQL). Today, millions of migrant workers and their families are building our modern spaces but they themselves are surrounded by poor housing conditions, poverty, illness and despair; and are fighting a daily battle for their survival. Our mission is to give them a chance to lift themselves out of this cycle of despair.

CBRE Cares supported by CBRE Foundation, a non-profit, public benefit corporation that funds our company's philanthropic initiatives has pledged its efforts to address the health and nutrition related concerns of migrant workers & their families (especially women and children) living in and around the various construction sites in India.

The first edition of CBRE Cares – "Ek Pehal" is a small beginning to improving lives of those with the greatest needs. As part of this initiative, a "Social Mobility Unit" (SMU) will visit slums/ jhuggis/labour colonies around the various construction sites and offer health & nutrition, basic education and awareness on sanitation practices and other services as per need identified to the migrant workers and their families. This "Social Mobility Unit" (SMU) is essentially a team of dedicated social workers, doctors, counsellors, mobilizers, etc. who will ensure health and well-being of children, adolescents and women living in and around these sites.

**"EK PEHAL" FOR CHILDREN**  
Basic health checkup services - weight, vaccination, treatment of skin infections, cough-colds, diarrhoea/pneumonia, cut/bruises, etc.  
Supplementary nutrition to replenish micronutrients and proteins.  
Health supplements like Vitamins, Iron etc.  
Health and Hygiene (nail-cutting, hand washing, access to soap etc.).

**"EK PEHAL" FOR ADOLESCENTS**  
Health check ups  
Supplementary Nutrition, micronutrient supplementation, and nutrition education  
Menstrual Hygiene  
Protection and safety

**"EK PEHAL" FOR PARENTS**  
Offer child care and development services  
Health, nutrition and family planning services  
Session for parents using videos, counsellors'/doctors' chats

We believe each one of us can make a difference. CBRE keeps its doors open for collaborations with government, corporates and nonprofit organizations to help execute the plan on-ground and further strengthen the reach across the country.

The CSR outreach of the company may also include direct engagement in selected projects, as recommended by the Committee and approved by the Board of Directors.

In addition, CBRE may also contribute to Government funds prescribed under Schedule VII of the Companies Act, 2013, if deemed appropriate by the CSR Committee and approved by the Board.

### **Social Priority Investments (SPI)**

CBRE's Social Priority Investments (SPI) as part of CSR funding will be aimed at maximizing social benefits for local communities through collaboration with pioneering NGOs/Implementing Partners (IPs) to bring about a lasting impact on the lives of the beneficiaries

The CSR Committee and CEPMC will adhere to the due diligence guidelines (as approved by the committee) and undertake due diligence appropriate to the size and nature of the proposed relationship when electing to partner with an NGO/IP. Due process will be adhered to in order to formalize the prospective arrangement in documentation (i.e. Memorandum of Understanding).

The following broad parameters will be taken into consideration as part of due diligence process for NGOs/IPs responding to RFPs:

1. Competence of the NGO/IP in the area, sector and issue resolution
2. Identity of NGO/IP
3. Management capability
4. Accountability
5. Transparency and financial capability
6. Prevention of conflict of interest

### **Governance of Social Priority Investments (SPI) and disbursement of funds**

CBRE will establish appropriate, transparent mechanisms for the management of Social Priority Investments (SPI) as part of its CSR mandate. The following broad process points will be adhered to:

- Check request for funding against CBRE's focus area and policy document
- Request for Proposal (RFP) (as per format approved by the CSR Committee)
- Evaluate Proposals (CEPMC) and conduct Due Diligence (as per format approved by the CSR Committee)
- Workplan presentations to be made by the proposee
- Submit recommendations to the CSR Committee for approval
- Formalize the workplan and signing of agreement

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- Recommend a detailed baseline (where applicable)
- On approval, disburse the initiation amount to the Implementing Partner (IP) organization and commence activity
- Conduct field visits (as per schedule approved by the CSR Committee/CEPMC)
- Monitoring of targets/milestones as per workplan

All disbursements will be processed by the CEPMC after obtaining due clearances of authorized signatory of the CSR committee or appointed member from the same. This will ensure that decisions are subject to proper management control and in compliance with all related legal and regulatory obligations

### Avoiding Conflict of Interest

Every member of the CSR committee and CEPMC will need to sign a Declaration of Interest in reference to any partnerships with NGO/IP/corporates or any other entities as a measure of prevention of conflict of Interest as the case may be that a member has a material interest in the partnering organization.

Where CBRE executives join the Board of a not-for-profit or any entity to improve the governance and oversight over its activities, they should remove themselves from any decision process to fund the entity

Requests made by clients/customers to provide fund support to not-for-profits should be refused and directed to the regular partnership and due diligence process.

### Monitoring and reporting

The CEPMC is responsible for gathering information on the social impact of programmes and projects undertaken and report the same to the CSR committee. 'Input', 'Process', 'Output', 'Outcome' and 'impact' measures will be monitored for all programmes and projects. The CEPMC will ensure that the IPs monitor and report on the outputs and impacts of their projects in the prescribed format as may be disseminated as part of the workplan. Projects will be monitored through: quarterly report cards, mid-term evaluation reports, annual reports along with fund utilization reports (as per format approved by the CSR Committee) and field visits of programmes/projects. A detailed Monitoring and Reporting Framework has been prepared and is part of CBRE's CSR Operational Manual.

The Board of Directors will ensure that all CSR related activities are reported at the end of each financial year as required under the provisions of the Act.

In case of direct implementation, progress of the projects will be monitored directly by the CSR Committee on quarterly basis.

### CBRE Employee Engagement

At CBRE we believe that each one of us can make a difference. Hence, CBRE has created an Employee Engagement Program with includes various activities in the spirit of giving back to the society. These include and not restricted to:

- **Social Day off** – CBRE employees get a chance to visit CSR locations and participate in the activities or simply interact with the beneficiaries. Selection of employees will be on first come, first serve basis
- **Building my community** – A space for employees to provide unique solutions and suggestions to social problems

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### General

CBRE has in place a CSR operational manual as an extension of the CSR policy document to guide the executive team on all processes and activities related to CSR of the firm

In case of any doubt with regard to any provision of the CSR Policy, CSR operational manual and matters not covered herein, a reference should be made to the CSR Committee and/or CEPMC as may be applicable. In all such matters, the interpretation and decision of the CSR committee will be final.

Any or all provisions of the CSR Policy will be subject to revision/amendment in accordance with the guidelines on the subject as may be issued from Government, from time to time.

The CSR committee reserves the right to modify, cancel, add or amend the CSR Policy, which will thereafter be approved by the Board of Directors