

**DOLPHIN OFFSHORE  
ENTERPRISES (INDIA) LTD.**

**CSR POLICY**

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## **1. Preamble**

At Dolphin Offshore Enterprises (India) Limited (DOEIL), we are committed to the DOEIL's Vision and Mission of creating more inclusive and greener India. DOEIL's strategic Corporate Social Responsibility (CSR) projects are aimed at achieving DOEIL goals and have helped us build a reputation of being one of the most socially and environmentally responsible companies in India.

## **2. Purpose**

The key purpose of this policy is to:

- Define what CSR means to DOEIL and the approach adopted to achieve DOEIL goals
- Identify broad area of intervention in which the company will undertake projects
- Define the kind of projects that will come under the ambit of CSR
- Serve as a guiding document to help execute and monitor CSR projects.
- Elucidate criteria for implementation agencies
- Explain the manner in which the surpluses from CSR projects will be treated.

## **3. Policy Statement'**

Through DOEIL CSR Policy, we align DOEIL CSR strategy with the DOEIL group's vision and goals. The policy focuses on addressing critical social, environmental and economic needs of the marginalised / underprivileged sections of the society. We adopt an approach that integrates the solutions to these problems into the strategy of the company to benefit the communities at large and deliver social and environmental impact.

## **4. Scope of CSR activities in DOEIL**

As a practice, we classify only those projects that are over and above DOEIL's normal course of business as CSR. This policy applies to all DOEIL's CSR projects. On a periodic basis this policy will be reviewed and updated in the line with relevant codes of corporate governance, international standards and best practices.

Furthermore, the policy also fulfils the requirement of the CSR rules as per the Section 135 of the Companies Act, 2013.

#### **4.1 Normal Course of Business**

DOEIL's normal course of business is executing EPC contracts and Diving operations, contracts. With a vision to be leading offshore construction company in India, we ensure our innovative services and execution of jobs, set the market trends and satisfy the needs of the consumers. We also give a high priority to comply with the regulatory requirements while keeping up with the industry standards in procurement, manufacturing technology safety etc.

### **5. Goals of DOEIL**

By 2020, we aspire to be a global provider of integrated services to the oil and gas industry, with diversified portfolio for involving Underwater, Marine and Offshore Constructions. DOEIL CSR policy contributes to the Group wise goals by adopting projects in the areas of intervention defined in Schedule VII of the Companies Act 2013 which are as follows;

- i. promotion of all kinds of education and training;
- ii. eradicating extreme hunger and poverty;
- iii. promoting gender equality and empowering women;
- iv. reducing child mortality and improving maternal health;
- v. combating human immunodeficiency virus, acquired immune deficiency
- vi. syndrome, malaria and other diseases;
- vii. ensuring environmental sustainability;
- viii. employment enhancing vocational skills and training;
- ix. social business projects;

### **6. Key focus Areas**

#### **6.1 Employability**

India has 600 million people below the age of 25 out of which only 80 million (13%) are employable. Recognising the seriousness of this problem, we have undertaken projects that focus on capacity and skill

building of diverse target groups from overall youth to make them employable and improve their earning potential and livelihood.

## **7. Governance Structure**

We have constituted a robust and transparent governance and structure to oversee the implementation of DOEIL's CSR Policy, in compliance with the requirements of Section 135 of the Companies Act, 2013.

### **7.1 Board Level CSR Committee**

The CSR government structure of DOEIL will be headed by the Board Level CSR Committee.

#### **7.1.1 Members**

This committee will report to the Board of the Company, and will comprise of:

- a. Mr. Satpal Singh
- b. Mr. Navpreet Singh
- c. Mr. J. Jayaraman
- d. Mr. Sabyasachi Hajara
- e. Vice Admiral H S Malhi

#### **7.1.2 Responsibilities**

- Formulate and update DOEIL CSR Policy, which will be approved by the Board of DOEIL
- Suggest areas of intervention to the Board of DOEIL
- Approve projects that are in line with the CSR policy
- Put monitoring mechanism in place to track the progress of each project
- Recommend the CSR expenditure to the Board of DOEIL for approval
- Meet twice a year to review the progress made.

## **7.2 Management Committee**

The CSR Committee shall constitute a Managing Committee which shall be responsible for ensuring the smooth execution of all the CSR projects within the company. The committee will report to the said CSR Committee.

### **7.2.1 Members**

The members will include heads of individual division and other persons as may be decided by the CSR Committee.

### **7.2.2 Responsibilities**

- Responsible for the execution of the decisions taken by the Board Level CSR Committees.
- Ensure on-ground implementation of projects.
- Send periodic reports to the Board level CSR Committee
- Meet every quarter to review the progress

## **8. CSR Budget**

The total budget for the CSR project will be decided as a part of the Annual Operating Plans in accordance with the goals and priorities identified for each of the key focus areas by the CSR Committee.

## **9. Project Life-cycle**

At DOEIL, CSR project are strategically planned and managed. Following are the key stages of a project.

### **9.1 Project approval**

The projects suggested by the Management Committee in consultation with the Company level programme managers will be presented for the approval of the Board level CSR Committee.

## **9.2 Implementation**

The final projects approved by the Board Level CSR Committee will be sent to the individual Programme Managers, who in turn will break down the projects into time-bound targets and action plans. These projects will either be self-implemented in partnership with an implementing Agency or in collaboration with another corporation.

## **9.3 Monitoring**

The individual Programme Managers will be responsible for monitoring approved projects by methods which may include site visits, review meeting, progress reports etc. Online portals have been developed to track data and monitor projects thereby ensuring transparency and efficiency in the implementation process. Projects will be evaluated against the goals and milestones defined for the project, together with the implementing Agency (if any). The reports will be submitted to the Management Committee for the quarterly review meetings.

## **9.4 Reporting**

The Board level CSR committee, based on reports presented by the Management Committee will annually publish report on the CSR projects as part of the Directors' Report. The report will disclose information in the format of prescribed by the Section 135 of the Companies Act, 2013.

## **10. Partners Qualification**

If a third party is employed to carry out the implementation of DOEIL's CSR projects, the Board of DOEIL will ensure that they have a clearly explained mission vision and an established track record of three years in undertaking similar projects or programmes. The implementation agencies should be able to produce their latest audited annual reports and in case of NGO, they should also be able to produce their registration forms according to 80G/12A.

## **11. Treatment of Surpluses**

Any surplus generated from CSR projects undertaken by us will be tracked and channelized into DOEIL's CSR Corpus. These funds will be further used in development of the CSR projects and will not be added to the normal business profits.

For **Dolphin Offshore Enterprises (India) Limited**

**Satpal Singh**  
**Managing Director & CEO**

March 23, 2015