

NINE RIVERS CAPITAL HOLDINGS PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

PREAMBLE :

With the rapidly changing corporate environment, the concept of Corporate Social Responsibility (CSR) has gained prominence. Corporate India had always worked towards upliftment of the vulnerable class of the society and other social causes. In order to streamline and channelize these resources of all the Corporate as whole in larger interest of the society, the government has mandated such spends and laid the procedure for the same by including it in the section 135 of the Companies Act, 2013 ('the Act') and the Rules made thereunder.

Nine Rivers Capital Holdings Private Limited ('the Company'), as a good corporate citizen, has adopted CSR as a strategic tool for sustainable overall growth and in doing so, the Company aims at building a better and sustainable society as a whole.

This Policy lays down broad approach and direction for selection, implementation and monitoring of CSR activities as well as formulation of the Annual Action Plan pursuant to the CSR obligations in the sphere of CSR undertaken by the Company.

CSR VISION AND STATEMENT AND MISSION :

The Company's Vision is to strive to contribute to the social and economic development of the communities around by way of providing sustainable solutions for a better life.

OBJECTIVE OF THIS POLICY IS :

- To elaborate on the Company's commitment to CSR; define the types of CSR projects that the Company will engage in; and outline the monitoring process for those projects.
- To promote a unified and strategic approach to CSR and thereby enabling maximum impact of the CSR initiatives.
- To ensure an increased commitment at all levels in the organization, to operate in an economically, socially and environmentally responsible manner while recognizing the interests of all its stakeholders.

POLICY STATEMENT :

a) Core Ideology

For the Company, Corporate Social Responsibility goes beyond just adhering to statutory and legal compliances, and creates social and environmental value while supporting the Company's business objectives and at the same time enhancing relationships with key stakeholders and customers.

b) Budgeting and Spend

Minimum amount to be spent for CSR activities will be as per the provisions of Section 135 of the Act and the Rules made thereunder.

CSR programmes or projects or activities shall be undertaken in India only. CSR programmes or projects or activities shall not benefit only employees of the Company or their families.

Any surplus arising out of CSR projects shall not form part of business profit of the Company.

c) Thrust Areas

The Company's commitment to CSR will be manifested by investing resources in one or more of the following areas:

- Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
- Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air, and water including contribution to the Clean Ganga Fund set-up by the Central Government for the rejuvenation of river Ganga;
- Protection to national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
- Measures for the benefits of armed forces veterans, war widows and their dependants;

- Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
- Rural development projects;
- Slum area development;
- Contribute to the Prime Minister's National Relief Fund
- Any other areas as mentioned in Schedule VII of the Act.

d) Constitution and Role of the CSR Committee and Role of the Board

The Board shall constitute a CSR Committee of the Board pursuant to the provisions of Section 135 of the Act, as applicable from time to time. However, where the amount to be spent by the Company for CSR activities does not exceed Rs. 50 Lacs, the requirement of constitution of the CSR Committee shall not be applicable and the functions of CSR Committee may be discharged by the Board, if so decided by the Board.

The mandate of the said CSR Committee shall be :

- To formulate and recommend a CSR Policy to the Board;
- To formulate and recommend Annual Action Plan to the Board;
- To recommend amount of expenditure to be incurred on CSR activities;
- To monitor the CSR Policy of the Company from time to time.

The Board is to ensure that the activities included in the CSR Policy are undertaken by the Company and that the Company spends stipulated amount in every financial year and that the Company gives preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR activities.

While CSR programmes or projects may be identified by the Head Office through CSR Committee, the CSR Committee may also evaluate programmes or projects submitted by NGOs/ NPOs (i.e. registered trust or registered society or Section 8 company). The CSR Committee shall ensure that the Company's CSR activities do not include the activities undertaken in the normal course of business by the Company. Such programmes should be mapped with the activities as specified in the Schedule VII of the Companies Act, 2013.

Any modifications / changes in this Policy shall be made only after the approval of the Board of Directors of the Company on the basis of recommendations made by the CSR Committee.

e) Implementation

CSR initiatives will be undertaken either by the Company itself with the active involvement of the employees or through registered trust or registered society or Section 8 company, either singly or along with its holding or subsidiary or associate company, or along with any other company.

Provided that -

- i. if such trust, society or company is not established by the Company, either singly or along with its holding or subsidiary or associate company, or along with any other company then such trust, society or company shall have an established track record of at least 3 years in undertaking similar programmes or projects;
- ii. the Company has specified projects or programmes to be undertaken through these entities, the modalities of utilization of funds on such projects and programmes and the monitoring and reporting mechanism.

The Company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that collaborating companies are in a position to report separately about CSR activities as per the reporting requirements under the Companies Act and the Rules thereunder.

f) Monitoring Mechanism

The Company will ensure it receives from the implementing agencies periodic progress reports during the course of the project and a final report on completion of the project, along with appropriate documents/records/certificates detailing the grant utilization towards the project. The project reports and utilization reports as received from the implementing agencies will be evaluated and recommendations will be made to the implementing agencies for any action/course correction, if deemed necessary.