



Corporate Social responsibility (CSR) Policy

1. Introduction

Shri Ram Finance Corporation Private Limited (hereinafter referred to as 'the Company') is established in the year 2004. Company is required to contribute towards Corporate Social Responsibility which include but not limited to, promotion of education, environment, healthcare, and betterment of the society through respect for universal human rights and the environment, acting with integrity and accountability and operating responsibly and sustainably.

2. Objective and Scope

2.1. Objective

The main objective of the CSR Policy is to lay down guidelines to make CSR as one of the key focus areas for making a positive contribution to society through effective impact and sustainable development programs. This Policy covers the proposed CSR activities to be undertaken by the Company and ensuring that they are in line with Schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only and includes strategy that defines plans for future CSR activities.

2.2. Scope & Coverage

The CSR activities of the Company shall include, but not limited to any or all of the sectors/activities as may be prescribed by Schedule VII of the Companies Act, 2013 amended from time to time. Further, the Company will review the sectors/activities from time to time and make additions/ deletions/ clarifications to the above sectors/activities.

3. Corporate Social Responsibility (CSR) Committee

The Board of the Company has constituted a Corporate Social Responsibility (the "CSR") Committee in accordance with Section 135 of the Act and applicable rules thereto. During the financial year under review, the Committee is comprised of 3 (three) directors of which 1 (one) is an independent director viz, Harsh Kumar Maheshwari, Mr. Gaurav Bhattar, Director and Mr. Ganesh Bhattar, Director.

During the period under review, one CSR Committee Meeting was convened and the required quorum was present. The attendance of the members of the Committee at the above meeting were as under:

Sr. No.	Name of Director	Position	DIN
1	Mr. Ganesh Bhattar	Director	01248202
2	Mr. Gaurav Bhattar	Director	01248032
3	Mr. Harsh Kumar Maheshwary	Independent Director	00088660

4. CSR Implementation

The Board shall ensure that the CSR activities are undertaken by the company itself or through -

- (a) 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, established by the company, either singly or along with any other company, or
- (b) 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
- (c) any entity established under an Act of Parliament or a State legislature; or
- (d) 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

A company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees/Board of respective companies are in a position to report separately on such projects or programmes in accordance with CSR rules

5. Functions and Powers of Board

To effectively implement the objectives of the Company with respect to CSR, the Board is vested with the following functions and powers:

- a. Formulate CSR Policy
- b. Identify and undertake CSR activities as stated under Schedule VII of the Act
- c. Determine Annual CSR Plan and make plan for CSR Budget
- d. Spend the allocated CSR amount on the CSR activities in accordance with the Act and the CSR Rules
- e. satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it
- f. In case of ongoing project, to monitor the implementation of the project with reference to the approved timelines and year-wise allocation and to make modifications, if any, for smooth implementation of the project within the overall permissible time period.
- g. Monitor CSR Policy from time to time

6. CSR Spend

The Companies Act, 2013 prescribes that the companies which meet the criteria specified U/s. Sec. 135 shall allocate 2% of its annual net profits (calculated as per Sec. 198) during the three immediately preceding financial years to be spent on CSR Activities that fall under the categories specified under Schedule VII of the Act.

7.1. CSR Expenditure

Net profit for the purpose of allocation towards CSR means profit more fully described under Rule 2(f) of the CSR Rules. The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by the Board of Directors on the recommendation of its CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII of the Act.

7.2. Failure to spend the CSR Money

Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

Until a fund is specified in Schedule VII for the purposes of subsection (5) and (6) of section 135 of the Act, the unspent CSR amount, if any, shall be transferred by the company to any fund included in schedule VII of the Act

7.3. Excess spend for CSR

Where a company spends an amount in excess of requirement, such excess amount may be set off against the requirement to spend up to immediate succeeding three financial years subject to the conditions that –

- (i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, in pursuance of sub-rule (2) of CSR rule.
- (ii) the Board of the company shall pass a resolution to that effect.

7.4. CSR for creation or acquisition of a capital asset

The CSR amount may be spent by a company for creation or acquisition of a capital asset subject to compliance of CSR Rules.

8. CSR Initiatives

Pursuant to Schedule VII of the Act and the CSR Rules, the Board shall undertake CSR activities included in its Annual CSR Plan, at the beginning of each year. The Board is empowered to approve any modification to the existing Annual CSR Plan or to propose any new program during the financial year under review.

9. CSR Reporting

(i) The Board's Report of the company shall include an annual report on CSR containing particulars in as specified in CSR rules.

(ii) In case of having average CSR obligation of ten crore rupees or more, in the three immediately preceding financial years, Company shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study. The impact assessment reports shall be annexed to the annual report on CSR.

10. Publication of CSR policy

Composition of the CSR Committee, and CSR Policy and Projects approved by the Board on shall mandatorily be disclosed on website of the company, if any, for public access

11. Amendment to the Policy

This CSR Policy can be amended at any time pursuant to recommendation of CSR Committee followed by approval of the Board of Directors.

**BY THE CSR COMMITTEE OF SHRI RAM FINANCE CORPORATION PRIVATE LIMITED
RECOMMENDED TO THE BOARD OF DIRECTORS**

Sd/-

Chairman

Dated:

APPROVED AND ADOPTED

BY THE BOARD OF DIRECTORS OF SHRI RAM FINANCE CORPORATION PRIVATE LIMITED

Sd/-

Chairman