

VM VINIMAY PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

Introduction

Corporate Social Responsibility [CSR] is a kind of social responsibility integrated into a business model. CSR goes beyond compliance and engages in actions that appear to further some social good, beyond the interests of the firm and that which is required by law. CSR is a process with the aim to embrace responsibility for the company's actions and encourage a positive impact through its activities on the environment, consumers, employees, communities, stakeholders and all other members of the public sphere who may also be considered as stakeholders.

In VM Vinimay, we are committed to economic, social, environmental and cultural growth of the underprivileged in an equitable and sustainable manner in the peripheral areas around its corporate office and area of operation. Over the years, the company worked for enrichment of lives across these communities emphasizing the point that a sense of social responsibility is inherent to its entrepreneurship.

Our vision for CSR is - "to contribute for bringing social and economic change to the underprivileged section of the society in an equitable manner and to contribute for the skill development as means of livelihood for the weaker sections of the society. This way we are building our business on responsible, sustainable and ethical foundations within a commercial framework to enable us to be a significant and effective force for positive change. In doing so we believe we are contributing to develop the quality of human life and making a better India".

Legal requirement

Pursuant to Section 135 of the Companies Act, 2013 [hereinafter referred to as "the said act"] read with Companies [Corporate Social Responsibility] Rules, 2014, the company is required to formulate a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII of the said act and the expenditure to be incurred thereon, excluding activities undertaken in pursuance of normal course of business of a company. The company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for Corporate Social Responsibility activities. CSR activities do not include the activities undertaken in pursuance of normal course of business of the company. The surplus arising out of the CSR projects or programs or activities, if any, shall not form part of the business profit of a company.



Implementation Process

The company will encourage voluntary effort of its directors and employees to CSR projects. The company also encourage its directors and employees to recommend to the CSR committee meaningful projects in accordance with the guiding principles that may be taken up by the company under supervision CSR committee.

In addition to projects that may be taken up by the company directly, CSR activities will also be carried on by the Company through:

Balrampur Foundation, and

Other society, trust, hospital, fund or organizations engaged in activities specified in Schedule VII of the said act, as may be approved by the CSR Committee of the Board in accordance with the provisions of the said act and rules made thereunder.

CSR activities through Balrampur Foundation

- a) Livelihood enhancement and poverty alleviation
- b) Education including skill development for empowerment of women and others.
- c) Healthcare, sanitation & safe drinking water
- d) Rural development and transformation
- e) Environment sustainability & climate change
- f) Disaster management

CSR activities through others

The Policy recognizes that CSR is not merely a compliance; it is commitment to support initiatives that measurably protect environment, spread/promote education and improve the lives of unprivileged. CSR activities may be carried on by the company through other society, trust, hospital, fund or organizations engaged in activities specified in Schedule VII of the said act, subject to approval by the CSR Committee of the Board in accordance with the provisions of the said act and the CSR Rules.

Modalities And Implementation Schedule for Execution of Projects or Programs or CSR Activities

The Company will undertake its CSR activities, approved by the CSR Committee either directly or through a Registered Trust or through a Registered Society or establish another company under Section 8 of the Companies Act, 2013 or even to collaborate with other entities as approved by the CSR Committee. The implementation Schedule for CSR activities will be dependent on the availability of eligible projects. The surplus arising out of the CSR activities, projects or programs shall not form part of the business profits of the Company.

Partnerships

The Company or the trusts may form collaborative partnerships with the Government, the District Authorities, the village panchayats, NGOs and other like-minded stakeholders for



carrying the CSR activities. This helps widen the Company's reach and leverage upon the collective expertise, wisdom and experience that these partnerships bring to the CSR activities.

Expenditure

As mandated under section 135 of the Companies Act, 2013 read with Companies [Corporate Social Responsibility] Rules, 2014, expenditure on CSR activities in any financial year shall not be less than 2% of the average net profits of the company made during the three immediately preceding financial years. The Budget of the CSR activities to be carried on by the Company shall be placed before the CSR Committee. Requisite approval shall also be taken from the Board, if necessary.

Provided that if the company fails to spend such amount, i.e. 2% of average net profit, the Board shall specify reason for not spending the amount.

Composition of CSR Committee

The CSR Committee shall comprise of at least two Directors as may be appointed by the Board from time to time and in accordance with the applicable provisions of the Companies Act, 2013.

Responsibilities of CSR Committee

The responsibilities of the CSR Committee include:

- a) Formulating and recommending to the Board of Directors the CSR policy and indicating activities to be undertaken;
- b) Disclose composition of CSR Committee;
- c) Recommending the amount of expenditure for CSR activities mentioned in (a) above;
- d) Ensure CSR activities are undertaken by the Company;
- e) Monitoring CSR activities from time to time.

Monitoring

CSR Committee shall monitor the implementation of CSR activities carried on by the Company. The company shall prepare a report of the CSR programs/activities carried on by the company through trusts & others and expenditure incurred thereon shall be placed before the CSR Committee.

Information dissemination

The Company shall provide in prescribed format as set out under Companies (CSR Policy) Rules, 2014, the details of its engagement in CSR activities on its Website and Annual Reports.



Review of Policy

This CSR policy document will be reviewed annually from time to time and any changes, if necessary, as recommended by the CSR Committee shall be approved by the Board but at least once in a year.

