

Corporate Social Responsibility Policy

Background

At the outset, CSR activities at **M/s.Manav Marketing Private Limited** are already in existence for the benefit of the employees and their immediate family members in the areas of extending loan to employees, participation at festivals and best worker award etc.

It is recognized that integrating social, environmental and ethical responsibilities into the governance of businesses ensures the long-term success, competitiveness and sustainability.

Further, CSR makes a business sense as companies with effective CSR, have image of socially responsible companies, achieve sustainable growth in their operations in the long run and their products and services are preferred by the customers.

Objective

The main objective of CSR policy is to make CSR a key business process for sustainable development of the society. The Company shall act as a good corporate citizen and aims at supplementing the role of Government in enhancing the welfare measures of the society within the framework of its policy and creating opportunities for employees to participate in socially responsible initiatives.

Measures

In the aforesaid backdrop, the policy on CSR of the Company is broadly framed taking into account the following measures:

The CSR activities shall be undertaken by the Company, as stated in this Policy, as projects or programs or activities (either new or ongoing), excluding activities undertaken in pursuance of its normal course of business.

The CSR activities which are exclusively for the benefit of the Company's employees or their family members shall not be considered as CSR activity.

The Company shall give preference to the local area or areas around it where it operates, for spending the amount earmarked for CSR activities.

The Board of Directors of the Company may decide to undertake its CSR activities, through a registered trust or a registered society or a company established by the company or its holding or subsidiary or associate company pursuant to Section 135 of the Companies Act, 2013 and rules made there-under.

The following is the list of CSR projects or programs which the Company plans to undertake pursuant to Schedule VII of the Companies Act, 2013:

1. eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
2. promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
3. promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
4. 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;
5. protection of 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;
6. measures for the benefit of armed forces veterans, war widows and their dependents;
7. training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;

8. contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
9. contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
10. Rural development projects;
11. Slum area development;
12. Disaster management, including relief, rehabilitation and reconstruction activities.
13. Any other measures with the approval of Board of Directors on the recommendation of CSR Committee subject to the provisions of Section 135 of Companies Act, 2013 and rules made there-under.

Organizational mechanism and responsibilities

Constitution of Corporate Social Responsibility Committee:

As per Section 135(9) of the Companies Act, 2013, the Corporate Social Responsibility Committee is not mandatory for companies whose CSR expenditure is less than fifty lakh rupees. In such cases, the Board of Directors of the company shall perform the duties of the Committee as specified in this section. Therefore, in view of the provisions of Section 135 of the Companies Act, 2013, which require the constitution of a CSR Committee by the Board of Directors of the Company, the Board of Directors hereby assumes the role and responsibilities of the CSR Committee as per Sub-Section (1) of the said Section 135 of the Companies Act, 2013.

The Board shall –

- a. Formulate a CSR policy and activities to be undertaken by the company as per Schedule VII;
- b. Recommend the amount of expenditure to be incurred on the activities; and

c. Monitor the Policy of the company from time to time.

The Board of the Company shall approve the policy for the Company and disclose contents of such Policy in its report and also place it on the Company's website and ensure that the activities as are included in the CSR Policy of the company are undertaken by the Company.

The Company shall provide the vision under the leadership of its directors, Mr. S.K Mahadevan, Mrs. Malathi Mahadevan and Mr. Naveen Mahadevan.

At the Company, the said Directors take on the role of the mentors, while the onus for the successful and time bound implementation of the CSR activities/projects is on the HR Head and CSR teams.

To measure the impact of the work done, a social satisfaction survey / audit is carried out by an external agency.

Activities, setting measurable targets with timeframes and performance management:

Prior to the commencement of CSR activities/projects, the Board shall carry out a baseline study of the nearby area/villages of the Company's location (i.e., Bengaluru).

The study encompasses various parameters such as – health indicators, literacy levels, sustainable livelihood processes, and population data – below the poverty line and above the poverty line, state of infrastructure, among others.

From the data generated, a 1-year plan and a 5-year rolling plan are developed for the holistic and integrated development of the affected people.

All activities/projects of CSR are assessed under the agreed strategy, and are monitored every year, measured against targets and budgets. Wherever necessary, midcourse corrections are made.

Partnerships

Collaborative partnerships are formed with the Government, the District Authorities, the village panchayats, NGOs and other like-minded stakeholders. This helps widen the Company's reach and leverage upon the collective expertise, wisdom and experience that these partnerships bring to the table.

Budgets

A specific budget is allocated for CSR activities and spending on CSR activities shall not be less than 2% of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of this policy.

Approving authority for the CSR amount to be spent would be any one of the Directors of the Company after approval of the Board of Directors of the Company.

The CSR Policy mandates that the surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of a Company.

The CSR projects or programs or activities undertaken in India only shall amount to CSR expenditure.

CSR expenditure shall include all expenditure including contribution to corpus, for projects or programs relating to CSR activities approved by the Board, but does not include any expenditure on any item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Companies Act 2013.

Tax treatment of CSR spent will be in accordance with the Income Tax Act as may be notified by CBDT.

Unspent/ Unutilized Budget

The Company shall ensure to spend the amount allocated for CSR activities in each financial year. In case of any unspent/ unutilized CSR allocation of a particular year, will be carried forward and spent within the next two financial years.

If the budget is not fully utilized in a financial year, company shall disclose the reasons in its Annual Board Report for not fully utilizing the budget allocated for Corporate Social Responsibility activities planned for each year.

Information dissemination

The Company's engagement in this domain is disseminated on its website, annual reports and its house journals as and when deem fit.

Management Commitment

Our Board of Directors, our Management and all of our employees subscribe to the philosophy of compassionate care. We believe and act on an ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy.

Update

The Board of Directors of the Company will review the policy from time to time based on the changing needs and aspirations of the target beneficiaries and make suitable modifications as may be necessary.

Disclosure of Compliance with Companies Act, 2013

The Corporate Social Responsibility policy conforms to comply with the Section 135 of the Companies Act, 2013 on Corporate Social Responsibility as spelt out by the Ministry of Corporate Affairs, Government of India.

For MANAV MARKETING PVT. LTD.


Director
