

AUM CAPITAL MARKET PVT LTD CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Preamble

The Board of Directors (the “Board”) of Aum Capital Market Private Limited (the “Company” or “ACMPL”), has adopted the following policy and procedures striving for economic and social development that positively impacts the society at large; and more specifically communities in which ACMPL or its group companies operate. In so doing build a better, sustainable way of holistic life for the community and raise the country's human development index.

The Corporate Social Responsibility Committee will review and may amend this policy from time to time. This policy will be applicable to the Company and guide its obligations as a responsible member of society along with enhancing its relationships with all its stakeholders and communities including its employees based on the laws and regulations applicable on the Company.

2. Purpose

While this Policy is the stated position of the Company in the area of Corporate Social Responsibility and finds its independent justification under the Philosophy and business objectives of the organization, this Policy is also framed as per requirement of Sections 135 of the Companies Act, 2013 (“Act”) read with applicable Rules and Regulations under the Act.

The main objective of the CSR Policy is to lay down guidelines for ACMPL and its group companies to make CSR a key business process for sustainable development of the Society. It aims at supplementing the role of the Government in enhancing the welfare measures of the communities and enterprises linked directly or indirectly to business activities of the group and its subsidiaries. It is to ensure that the community receives good quality health care and education facilitates to help them grow, which in turn would lead to sustainable growth of the enterprises they are engaged with, the society and the country at large.

3. Philosophy

ACMPL being a responsible corporate citizen strives to bring about overall positive impact in societies/local communities living in cities where it has business footprint. It will take up a wide range of issues relevant to the local underprivileged /marginalised communities and make a lasting and sustainable impact.

4. Definitions

“Act” means the Companies Act, 2013.

“Company or ACMPL” means the Aum Capital Market Private Limited.

“Chairman” means Chairman of CSR Committee.

“CSR Committee or Committee” means Corporate Social Responsibility Committee of Board of Directors of the Company constituted under Section 135 of Companies Act, 2013.

“Board” means Board of Directors of the Company

“Employee” means employee of the Company whether employed in India or outside India.

“Policy” means Corporate Social Responsibility Policy.

Words and expressions used and not defined in this Policy but defined in the Act and rules and regulations made there under shall have the meanings respectively assigned to them in the Act and rules.

5. CSR Policy

The Companies Act amendment for mandatory Corporate Social Responsibility measures is well thought out considering that despite so many advancements, India lags behind its peers in providing basic necessities like healthcare and education to its citizens. These two sectors are very pillars for uplifting the entire nation.

CSR Vision

To contribute positively to the society and bring about sustainable change in the lives of the marginalized communities especially that of small and medium sized enterprise employees and their families aiming towards holistic development through innovative interventions in the area of health and education.

Guiding Principles

1. Sustainable and holistic community development comprising workers and employees of small and medium sized enterprises
2. Special focus on women, youth and children.
3. Adopting communities in cities where ACMPL has business footprint.
4. Preference to work with the most underprivileged section of the society.
5. Compliance with local regulations

Thematic Areas to support through CSR interventions are as under. The list of activities under the thematic areas is indicative and the actual activities on ground would be as per community's need which comes out of baseline survey.

- **EDUCATION** of school/in school children from the community with adequate educational skills, social values, communication skills, life skills, ethics and citizenship. Promote computer literacy and English language skills. As per need undertake school development activities to upgrade local schools for better quality education to community children
- **HEALTH** To promote the health and wellbeing of the women, girls, men and youth in the community through clinics, health camps, awareness on institutional deliveries, immunization, reproductive & child health, TB, HIV/AIDS, Malnutrition, Anemia, communicable & vector borne diseases etc.
- **WOMEN EMPOWERMENT** through educational skills and financial literacy to ensure that they are literate and financially independent. Imparting appropriate skill training to women and girls for enhancing their employability prospects
- **CIVIC ISSUES** To understand the community dynamics and challenges around local issues such as waste management, drinking water, women & child safety, improvement in sanitation, piping , drainage and disaster preparedness in situations such as fire and implement local and realistic solutions.
- **SOCIAL SECURITY** empowering community access various government welfare schemes across health, education, food security, pensions & saving schemes etc.

Project Cycle

- The Company shall endeavour to spend on the CSR activities as prescribed under the Act and rules framed there under, as may be amended from time to time
- For the purpose of achieving its CSR objectives, the Company may partner with organizations like NGOs, Academic and Training Institutions, companies, the Government and other stakeholders for project implementation and facilitation of CSR Policy.
- The selection of implementing partner and the due diligence parameters shall be conducted as per the internal policies of the Company as also as per the applicable regulatory requirements from time to time.
- The implementation modalities may be modified from time to time, as per recommendations of the CSR Committee of the Company
- Where required a needs assessment or baseline study will be conducted for initiating any project/program.
- Based on the findings of the baseline / needs assessment, the project is developed defining the goals, objectives, project interventions, time lines, resources, indicators and roles and responsibilities of the community and the implementing partner(s).
- All projects will have Key Performance Indicators (KPIs) to measure progress toward those goals and objectives set at the time of project definition. Based on the nature of the project, the KPIs will be defined and measured across various stages such as Inputs, Outputs, Outcome and Impact. A prime focus shall be to ensure a degree of self-sustainability of the initiative even after ACMPL exits the specific project.
- The project will define the beneficiary group as per the goal and the needs assessment / baseline study.
- In case the funds are not exhausted in a financial year they will be carried forward by the Company.
- The CSR Committee will perform a periodic assessment of the relevance, performance, efficiency and impact of the projects / programs.
- The implementing partner will report on the program(s) and the expenditure on a regular basis in addition to a yearly report which will include programs undertaken along with the expenditure incurred on it, future plan of action for the subsequent financial year and balance carried forward, if any. In cases where there is co-funding in the project or multiple partners, the implementing partner will report to all.

6. Corporate Social Responsibility Committee

As per the requirements of recently enacted Act and rules framed there under, the Board of Directors on August 16, 2022 constituted CSR Committee which consists of Chairman, Managing Director and a Director. The mandate of the CSR Committee is essentially:

a). To Formulate and recommend to the Board of Directors, the

- i. CSR policy
- ii. Expenditure on CSR activities
- b). Monitoring of CSR policy from time to time
- c). Recommending CSR projects, which are in line with the activities specified in Schedule VII, to be undertaken by the Company
- d). Recommending the amount of expenditure to be incurred on CSR projects
- e). Monitoring Mechanism for the implementation of the CSR Projects or programmes or activities undertaken by the Company

7. Reporting & Disclosures

Apart from the reporting requirement as mentioned hereinabove in the Policy, following regulatory disclosure requirements also need to be complied in relation to CSR activities of the Company:

- Composition of the CSR Committee shall be disclosed in the Board Report;
- The Board Report shall include an annual report on CSR activities in prescribed format (by Ministry of Corporate Affairs ('MCA')) containing specified particulars i.e. Brief Outline of CSR Policy, its content, the average net profit for the last 3 financial years and the prescribed CSR expenditures etc.;
- If the company fails to spend the prescribed amount, the Board shall, in its report specify the reasons for not spending the amount;
- The content of Policy shall be displayed on the company's website

Annual Report on CSR Activities to be included in the Board's Report every year. Format of Reporting for Directors' Report shall be as per **Annexure – 1** as may be amended from time to time.

Effective Date of the Policy

This Policy will come into effect from the date of approval of the same by the Board of Directors of Company i.e. from 28.07.2023.

Place : Kolkata

Date : 30th September, 2023

Annexure 1

FORMAT

ANNUAL REPORT ON CSR ACTIVITIES TO BE INCLUDED IN THE BOARD'S REPORT

1. A brief outline of the company's CSR policy, including overview of projects or programs proposed to be undertaken and a reference to the web-link to the CSR policy and projects or programs.
2. The Composition of the CSR Committee.
3. Average net profit of the company for last three financial years
4. Prescribed CSR Expenditure (two per cent. of the amount as in item 3 above)
5. Details of CSR spent during the financial year.
 - a. Total amount to be spent for the financial year;
 - b. Amount unspent, if any;
 - c. Manner in which the amount spent during the financial year is detailed below

S.No	CSR project or activity identified	Sector in which the project is covered	Projects or programme : (i) Local area or other (ii) Specify the State or District where the projects or programmes was undertaken	Amount outlay (Budget) project or programme wise	Amount spent on project or programs: Sub head: 1. Direct expenditure on project or programme ; 2. Overhead	Cumulative expenditure up to the date of reporting	Amount spent: Direct or through implementing agencies*
Total							

*Give details of implementing agencies

6. In case the company has failed to spend the two per cent of the average net profit of the last three financial years or any part thereof, the company shall provide the reasons for not spending the amount in its Board report.

7. A responsibility statement of the CSR Committee that the implementation and monitoring of CSR Policy, is in compliance with CSR objectives and Policy of the company.