

Aavishkaar Venture Management Services Private Limited

Corporate Social Responsibility Policy

TABLE OF CONTENTS

Sr. No.	Particulars	Page
1	Preamble	03
2	Objective of the policy	03
3	Governance Mechanism	03
4	Meetings of the CSR Committee	04
5	Duties and responsibilities of CSR Committee	04
6	Responsibilities of Board	04
7	CSR activities	04
8	Exclusion from CSR activities	05
9	CSR Partner / Collaboration	06
10	Budget	06
11	Project Identification	06
12	Monitoring	06
13	Documentation	06
14	Treatment of Surpluses	07
15	Disclosure of CSR Policy	07
16	Review	07

1. Preamble:

The Companies Act, 2013 (hereafter referred to as “Act”) has introduced the idea of Corporate Social Responsibility (hereafter referred to as “CSR”). It mandates qualifying companies to constitute Corporate Social Responsibility Policy (hereafter referred to as “Policy”).

The Policy of Aavishkaar Venture Management Services Private Limited (hereafter referred to as “AVMS”) has been designed in accordance with

- a. Section 135 of the act
- b. Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereafter referred to as “Rules”)
- c. Schedule VII of the Act Or any other applicable provisions or rules, as amended from time to time

2. Objective of the Policy:

The objective of CSR policy is to lay down the guidelines and mechanism to carry out CSR projects / programs by the AVMS and to report its CSR work in the format provided by the rules under the Act.

This policy is applicable to the AVMS with an immediate effect.

3. Governance Mechanism:

The board of the AVMS has constituted a CSR committee to oversee the implementation of its CSR Policy, in compliance with the requirements of Section 135 of the Act read with Rule 5 of the rules.

The members of the AVMS’s CSR committee shall be such as may be decided by the Board from time to time.

This committee is responsible for all aspects pertaining to decision making on the AVMS’s CSR policy.

In order to have efficient and effective execution, co-ordination, monitoring of CSR activities, AVMS has also constituted CSR execution team (hereafter referred to as ‘CSR Team’). This team will report to CSR committee.

4. Meetings of the CSR Committee:

The CSR committee shall meet at least once in every six months to review the implementation of CSR projects / programs.

5. Duties and Responsibilities of CSR Committee:

- a. Formulate and recommend to the Board, a CSR policy and activities to be undertaken by the AVMS as per Schedule VII
- b. Recommend the amount of expenditure to be incurred on the activities / programs
- c. Institute the transparent mechanism for implementation of the CSR projects and activities.
- d. Monitor the CSR activities timely and review the Policy of AVMS on yearly basis
- e. Submit an annual report on CSR activities undertaken for AVMS, to the Board for review and feedback.

6. Responsibilities of the Board:

- a. The Board shall review and approve the CSR policy based on the recommendation of CSR committee
- b. Ensure to spend at least 2% of the average net profit made during the three immediate preceding financial years
- c. Ensure to include followings in the Board Report;
 - i) Content of the CSR Policy and Composition of the CSR committee
 - ii) Report on CSR activities in the format as prescribed in the Rules notified by the Ministry of Corporate affairs
 - iii) Reasons for failure (if any) to spend required amount on CSR activities

7. CSR activities:

The AVMS can undertake any project/ program that are in line with following sectors as listed in Schedule VII of the Act.

- a. Eradicating hunger, poverty and malnutrition
- b. Promoting health care including preventive healthcare
- c. Promoting sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government
- d. Providing safe drinking water

- e. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects
 - f. Promoting gender equality, empowering women, setting up of homes and hostels for women and orphans, setting up of old age home, day care centre and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups
 - g. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources and maintaining quality of soil, air and water (including contribution to Clean Ganga fund set up by Central government for rejuvenation of River Ganga)
 - h. 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
 - i. Measures for the benefit of armed forces veterans, war widows and their dependents
 - j. Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
 - k. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
 - l. Contribution to Prime Minister's National Relief 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
 - m. Rural development projects
 - n. Slum area development
- AVMS will review the sectors from time to time and make amendment to the above sectors, if necessary.

8. Exclusion from CSR activities:

The following activities shall not form part of the AVMS CSR activities:-

- a. The activities undertaken in pursuance of normal course of business of a AVMS
- b. CSR projects / programs or activities that benefit only the employees of the AVMS and their families.
- c. Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes.
- d. Any CSR projects/ programs or activities undertaken outside India.

9. CSR Partner / Collaboration:

The Board of Directors of AVMS may decide to undertake CSR activities, projects or programs, approved by the CSR committee.

- a. by the AVMS itself
- b. through setting up of registered Trust, registered society or Section 8 company by AVMS or its holding or subsidiary or associates company
- c. through any Section 8 company, registered trust or registered society operating within India and having three years of established track record in undertaking the similar projects or activities that aligns with the AVMS's CSR activities
- d. In collaboration with any other company provided AVMS CSR Committee are in position to report separately in accordance with CSR rules

10. Budget:

Budget allocated for CSR activities at AVMS is as per the guidelines provided in the Act i.e. 2% of the average net profit of 3 immediately preceding financial years.

11. Project Identification:

- a. The CSR team will identify and propose the projects to the CSR Committee for approval
- b. The project identified and finalized will be in consonance with the Schedule VII of the Companies Act, 2013.

12. Monitoring:

The CSR committee along with CSR team would be responsible of monitoring approved projects. A comprehensive monitoring mechanism will be devised by the AVMS which may include visits to project sites, meetings, progress reports, analysis of Key indicators etc on a periodic basis.

13. Documentation:

The CSR Team of the AVMS will ensure that CSR projects are well documented including all the utilization certificates, agreements, invoices of actual spent etc. and accountability is fixed at requisite level of the CSR process and the implementation mechanism.

14. Treatment of Surpluses:

Any surplus, generated out of the CSR activities, will not be added to the normal business profit of the AVMS.

15. Disclosure of CSR Policy:

As per the CSR Rules, the contents of the CSR Policy shall be displayed on the AVMS's website – www.aavishkaarcapital.in apart from the disclosure in the Board's report.

16. Review:

The Committee shall review its CSR Policy from time to time based on the changing needs and aspirations of the target beneficiaries and make suitable modifications as may be necessary and submit the same for the approval of the Board.

*****END*****