

**STONEX INDIA PRIVATE LIMITED**

**CORPORATE SOCIAL RESPONSIBILITY POLICY**

## PREAMBLE & PHILOSOPHY

Corporate Social Responsibility (“**CSR**”) is based on the concept of giving back to the society as a responsible corporate citizen for inclusive growth and sustainable living of the corporate and the society at large and thereby creating a balances in the entire eco-system consisting of people, planet and business.

Stonex India Private Limited (“**SIPL**”), as a responsible corporate citizen, recognizes the fact that the success of the corporate and social welfare is interdependent and it is the primary and foremost duty of the corporate to care and reach the marginalized and needy sections of the society though its various initiates and interventions and to create, build and establish projects/programmes, which are replicable, scalable and sustainable for the growth of the weaker and deprived sections of the society. **SIPL**, with its philanthropic approach and through its capable administration, entrepreneurial vitality, innovation, creativity and leadership, aims to touch the core social issues and intends to create social welfare models which fills the necessary gaps and bring real change in the lives of the needy people, society and overall eco-system thereof for inclusive and sustainable growth.

## LEGAL AND REGULATORY REQUIREMENTS

Section 135 of the Companies Act, 2013 (hereinafter called as “the **Act**”), r/w The Companies (Corporate Social Responsibility Policy) Rules, 2014 hereinafter called as “**CSR Rules**”), as amended from time to time, contains the provisions related to Corporate Social Responsibility obligations of the Company. In accordance therewith, this policy has been drafted keeping in mind the Company’s business ethics, taking into consideration the direction given by the Board of the Company and the recommendations of its CSR Committee.

### APPLICABILITY

- ❖ This policy encompasses the Company's philosophy for delivering its responsibility as a corporate citizen and is titled as the "CSR Policy". Policy includes guiding principles for selection, implementation, monitoring and impact assessment of the CSR activities.
  
- ❖ This policy applies to all CSR activities/initiatives/programmes of the Company.

### OBJECTIVE

SIPL's CSR Policy intends to:

- ❖ lay down guidelines for Corporate Social Responsibility activities of SIPL;
  
- ❖ set high standards of quality in delivery of services in the social sector by creating robust processes and replicable models, and;
  
- ❖ operate its business in an economically, socially and environmentally sustainable manner, while recognizing the interests of all its stakeholders.

### CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

#### COMPOSITION OF CSR COMMITTEE

The CSR Committee consists of the following Directors:

- Mr. Gaurav Aggarwal
- Mr. Saurav Agrawal
- Mr. Vikas Aggarwal

## **MEETINGS**

The CSR Committee shall hold meeting as and when required, to discuss agenda pertaining to administration and implementation of the CSR Policy of the Company.

## **ROLE OF CSR COMMITTEE**

The role and responsibility of the CSR Committee will be as under:-

- ❖ To formulate and recommend to the Board of Directors [**“Board”**], a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act 2013;
- ❖ To recommend the amount of expenditure to be incurred on various CSR activities in a financial year;
- ❖ To monitor the Corporate Social Responsibility Policy of the Company from time to time.
- ❖ To recommend the Board on the guiding principles for selection, implementation and monitoring of CSR activities.
- ❖ To formulate and recommend to the Board, a CSR Action Plan in pursuance of its CSR policy.
- ❖ To recommend the Board to alter the CSR Action Plan at any time during the financial year based on the reasonable justification to that effect.
- ❖ To decide on any other matter/thing as may be considered expedient by the members in furtherance of and to comply with the CSR Policy of the Company.

- ❖ To perform such other functions as may be delegated by the Board and/or mandated by any regulatory provisions from time to time.

### FOCUS AREA

In accordance with the provisions of the Act, r/w Schedule VII of the Act, the activities which may be undertaken by the company, will be, inter-alia as follows:

- (i) Eradicating hunger, poverty and malnutrition, [“promoting health care including preventive health care”] and sanitation [including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation] and making available safe drinking water.
- (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- (iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- (iv) 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 [including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga].
- (v) 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 govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- (vi) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central

Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

- (vii) rural development projects
- (viii) disaster management, including relief, rehabilitation and reconstruction activities.
- (ix) Other, areas as may be decided by the Board from time to time, whether made part of this Policy or not

### GOVERNANCE

- ❖ Every year, the CSR Committee will place for the Board's approval, a CSR Plan delineating the CSR Programmes to be carried out during the financial year and the specified budgets thereof. The Board will consider and approve the CSR Plan with any modification that may be deemed necessary.
- ❖ The Board of Directors of the Company will assign the task of implementation of the CSR Plan within specified budgets and timeframes to a CSR Cell, which will be constituted by the Chairman of the CSR Committee.
- ❖ The CSR Cell to which the implementation is assigned will carry out such CSR Programmes as determined by the Board within the specified budgets and timeframes and report back to the Board on the progress thereon at such frequency as the Board may direct.
- ❖ At the end of every financial year, the CSR Committee will submit its report to the Board.

## IMPLEMENTATION FRAMEWORK

### Planning & Implementation

- ❖ CSR Cell will make the necessary planning for identification of the projects/programmes and implementation thereof under overall guidance and supervision of the Chairman of the CSR Committee.
- ❖ CSR Committee may propose to implement the CSR projects directly or through its Trust/CSR Company (Section-8)/other Entity(ies).
- ❖ Such CSR initiatives may be dovetailed with specific government programmes to achieve the desired targets.

## MONITORING AND FEEDBACK

- ❖ The CSR Cell will prepare progress report on the status of the CSR projects/programmes of the Company and submit the same before the Chairman of the CSR Committee/O/o Managing Director of the Company for review.
- ❖ A detailed report covering details of the project, amount allocated for the same and amount actually spent thereon and status of the project shall be reported to the CSR Committee as may be required by Chairman of the CSR Committee from time to time.
- ❖ CSR Committee to ensure that all CSR initiatives are known to our employees & customers through internal communication & updates on website.

### TRANSFER OF THE UNSPENT AMOUNT OF CSR OBLIGATION IN THE UNSPENT CORPORATE SOCIAL RESPONSIBILITY ACCOUNT

In accordance with the provisions of applicable provisions of the Section 135 of the Act, If at the end of the financial year, any amount remaining unspent pursuant to any ongoing project of the Company, then the said unspent amount, shall be transferred by to a special account to be opened by the company in that behalf for that financial year in any scheduled bank to be called the “**Unspent Corporate Social Responsibility Account**”, within 30 days of the closure of the financial year and such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.

### GENERAL

- ❖ Words and expressions used but not defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, the CSR Rules made thereunder or in any amendment thereto.
- ❖ This CSR Policy shall also be subject to such clarifications and FAQs as may be issued by Ministry of Corporate Affairs from time to time.
- ❖ In case of any doubt with regard to any provision in the Policy and also in respect of matters not covered herein, a reference will be made to CSR Committee and the interpretation & decision of the CSR Committee shall be final.
- ❖ The CSR Policy would be subject to revision/amendment in accordance with the guidelines as may be issued by the Government, from time to time.



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- ❖ The Company reserves the right to modify, add, or amend any of the provisions of this policy, subject to approval of the Board.
  
- ❖ In case of any subsequent changes in the provisions of the Act which makes any of the provisions in this Policy inconsistent with the Act, then the provisions of the Act would prevail over the Policy and the provisions in the Policy may be modified in due course to make it consistent with the Act.
  
- ❖ For queries related to the CSR Policy, pls write e-mail at [Pradeep.singh@stonexindia.com](mailto:Pradeep.singh@stonexindia.com)

Date of Original adoption / Revision Effective date of the Policy	Effective date of the policy
21.07.2023	21.07.2023

For Stonex India Pvt. Ltd.

Sd/-  
Gaurav Aggarwal  
Managing Director