

# Corporate Social Responsibility Policy

## Revision History

Version No.	Date	Changes made to document
1.0	17-Feb-2016	<i>Initial draft</i>
2.0	06-May-2021	<i>Changes made pursuant to amendments to the Companies Act and the CSR Rules.</i>

## VISTAAR FINANCIAL SERVICES PRIVATE LIMITED

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## VISTAAR FINANCIAL SERVICES PRIVATE LIMITED

### 1. Preamble

At Vistaar, we believe that by supporting and creating new economic opportunities for deserving small business women and men, lives can be enriched and communities can be transformed. Vistaar aims to continuously strive towards nation building by creating social and economic impact. While catering to the underserved segment of the society, we understand the responsibility of being a “corporate citizen” and hence lay down the Company’s “Corporate Social Responsibility (CSR) Policy”.

### 2. General Terms & Meanings

**Act** – means the Companies Act, 2013 as amended from time to time

**CSR** – means Corporate Social Responsibility

**Policy or CSR Policy** – means the policy approved by the board as the Corporate Social Responsibility policy of the company as amended from time to time.

**CSR Rules or Rules** – means Companies (Corporate Social Responsibility Policy) Rules 2014 and includes any amendments thereon

**Committee or CSR Committee** – Committee formed under CSR Policy to achieve objective and successful implementation of the policy

**Company** – Means Vistaar Financial Services Private Limited

**Ongoing project** – Ongoing project means a multi-year project undertaken by the Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification.

### 3. Applicability

The policy shall be applicable to all CSR activities of the company whether carried by it or through any implementation agency with effect from February 17, 2016.

### 4. Scope and Objectives

This CSR Policy is as per the requirement under the Companies Act, 2013 (hereafter referred to as “the Act”), read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 and other directions and clarifications issued from time to time (collectively referred to as the “CSR Regulations”). This policy lays down broad guidelines and principles for the Company’s activities in the sphere of corporate social responsibility.

- Vistaar’s CSR policy intends to strive for economic development that positively impacts the society at large.
- Establishing a guideline for compliance with the provisions of Regulations to dedicate a percentage of Company’s profits for social projects.
- Directly or indirectly take up programs that benefit communities at large and contribute to, over a period of time, enhancement in the quality of life and economic well-being of the common people.
- Creating opportunities for employees to participate in socially responsible initiatives.

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### 5. CSR Committee

The CSR activities of the Company will be coordinated and monitored by a CSR Committee for the successful implementation of the CSR Policy. The CSR Committee shall meet as and when required to carry out its duties effectively. The CSR Committee shall consist of three or more directors, of which at least one director should be an Independent Director. The Board, at its meeting held on February 17, 2016, had approved constitution of the CSR Committee. With effect from November 17, 2016, CSR Committee consists following members:

- Mr. Chandrashekhar Bhaskar Bhave (Chairman & Independent Director)
- Mr. Brahmanand Hegde
- Mr. Sandeep Farias

### 6. Roles and Responsibilities of the Committee

- i. Formulate and recommend to the Board, a CSR policy which shall indicate the activities to be undertaken by the Company as specified in the Act.
- ii. Recommend the amount of expenditure to be incurred on the activities.
- iii. Prepare a transparent monitoring mechanism for ensuring implementation of the projects, programs, activities proposed to be undertaken by the Company.
- iv. Formulation of strategies for efficient implementation of the activities undertaken.
- v. Monitor the policy from time to time.
- vi. Periodic reporting of all the CSR activities undertaken.

### 7. Annual action plan

The CSR committee shall formulate and recommend to the Board an action plan every financial year which shall include the following;

- a. *the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;*
- b. *the manner of execution of such projects or programmes*
- c. *modalities of utilisation of funds and implementation schedules for the projects or programmes;*
- d. *monitoring and reporting mechanism for the projects or programmes;*
- e. *details of need and impact assessment, if any, for the projects undertaken by the company. Impact assessment shall be undertaken if outlay is greater than Rs. 10 crores or such other amount as may be prescribed by the Companies Act 2013*

### 8. CSR Activities

The Company shall undertake any of the following CSR activities as listed in Schedule VII and Section 135 of the Companies Act, 2013 and the Rules framed thereunder.

1. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to Swatch Bharat Kosh set-up by Central Government for the promotion of sanitation and making available safe drinking water;
2. Promoting education, including special education and employment enhancing vocation skills

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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, daycare centres 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 fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air, water including contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of river Ganga;
5. Protection of national heritage, art and culture including restoration of buildings 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 recognised sports, para-Olympic sports and Olympic sports;
8. Contribution to the 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;
9. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
10. Rural development projects; or
11. Slum Area Development; or
12. Contribution to such other activities as notified by Ministry of Corporate Affairs

### 9. Allocation of Funds

The Company would spend not less than 2% of the average Net Profits of the Company made during the three immediately preceding financial years. The surplus arising out of the CSR activity will not be part of business profits of the Company. The Corpus would thus include the 2% of average net profits, as aforesaid, any income arising there from and surplus arising out of CSR activities.

### 10. Modalities and Implementation

The Company will undertake its CSR activities, as 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 Act or even collaborate with other entities.

In selecting any implementation agency, the Company shall;

- Ensure minimum three year track record of implementation agency
- Ensure registration by the implementation agency with the Central Government by filing of Form CSR 1 by the implementation agency
- Obtain unique CSR registration number of the implementation agency.

### 11. CSR Unspent amount

The Company shall open a separate account with the name and style of "Unspent Corporate Social Responsibility Account of Vistaar financial Services Private Limited" in accordance with section 135 of the Companies Act 2013.

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Unspent amount pertaining to identified ongoing projects shall be transferred to such account within 30 days of the end of every financial year. The details of balances in unspent account shall be reviewed by the CSR committee. The amount pertaining to each project in the unspent CSR account shall be spent within a period not exceeding three years.

Any unspent amount, if not relating to any ongoing projects shall be transferred to specified fund in Schedule VII of the Companies Act 2013 as per section 135(5) of the Act.

### **12. Reporting**

The CSR activities and achievements shall be reported as part of Director's Report in the Company's Annual Report and also as per the any other statutory and regulatory reporting requirements.

### **13. Monitoring**

CSR Committee shall ensure effective implementation of the CSR activities undertaken by the Company. The Committee shall further ensure that utilization of funds have been made for approved purposes. To this effect, the Chief Financial Officer of the Company, shall certify to the committee and to the Board of Directors.

### **14. Amendment**

Any or all provisions of the CSR policy shall be subject to revision/ amendment in accordance with the applicable laws/ rules/ guidelines on the subject, from time to time. The Company reserves the right to modify, cancel, add, or amend any of the above rules/ guidelines.

### **15. General**

- In case of any queries and doubts with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to CSR Committee. In all such matters, the interpretation & decision of the CSR Committee will be final.
- The Company reserves the right to modify, cancel, and add any provisions in the policy.