



CAPRI GLOBAL CAPITAL LIMITED
Corporate Social Responsibility Policy

Version 1.6

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This policy shall be applicable to all the employees of CGCL and employees of all the affiliates / group companies of CGCL and wherever the term 'CGCL' is used in the policy shall mean and be construed as CGCL and it's respective affiliate / group company as the case may be.

CAPRI GLOBAL CAPITAL LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY

1. INTRODUCTION

Capri Global Capital Limited (hereinafter referred to as “CGCL”) is classified as a Systemically Important Non-deposit accepting NBFC (NBFC NDSI) by the Reserve Bank of India (“RBI”) vide its certificate of registration dated November 5, 2007. Activities undertaken by the Company are governed by the Master Direction - Non-Banking Financial Company - Systemically Important Non-Deposit taking Company and Deposit taking Company (Reserve Bank) Directions, 2016, as amended from time to time.

2. VISION

“CGCL believes that its mandate does not end with multiplying returns for its shareholders and that it must fulfill its larger responsibility towards the society within which it operates and from which it draws sustenance.”

This document outlines the vision of CGCL towards Corporate Social Responsibility (“CSR”), in accordance with Section 135 of the Companies Act 2013 and the Rules thereunder.

3. OBJECTIVE

The main objectives of CGCL’s CSR Policy are:

- i. To develop a long-term vision and strategy for CGCL CSR objectives;
- ii. Establish relevance of potential CSR activities to CGCL core business and create an overview of activities to be undertaken in line with Schedule VII of the Companies Act 2013;
- iii. To deliver sustainable impact and elevate the quality of life of the most marginalized communities in areas where CGCL intervenes through its CSR initiatives;
- iv. To engage and influence CGCL’s employees and partners in fostering a sense of social commitment by undertaking volunteering and employee engagement activities;
- v. CGCL shall promote projects that are, (a) Sustainable and create a long-term change; (b) Have specific and measurable goals in alignment with CGCL philosophy; and (c) Address the most deserving cause or beneficiaries
- vi. To establish process and mechanism for the implementation and monitoring of the CSR activities for CGCL

4. CONSTITUTION OF THE CSR COMMITTEE

The Board of Directors of CGCL has constituted the Corporate Social Responsibility Committee (“CSR Committee”) consisting of 3 (Three) Members in accordance with Section 135 of the Companies Act 2013 (“Act”) on CSR and in accordance with the CSR Rules thereto. The CSR program will be overseen under the guidance of the CSR Committee.

A. Members of the Committee:

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|------|---------------------|-------------|
| i. | Ms. Nupur Mukherjee | Chairperson |
| ii. | Mr. S Ranganathan | Member |
| iii. | Mr. Rajesh Sharma | Member |

B. Functions of the CSR Committee:

- i. The Committee shall endeavor to spend at least 2% of the average net profit during the preceding three financial years, calculated in accordance with the relevant Sections of the Companies Act 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 on CSR activities;

- ii. formulate and recommend to the Board, a CSR Policy which shall indicate the frame work within which the proposed CSR activities would be undertaken;
- iii. select and approve CSR projects which will be identified based on the proposed thematic areas as provided under the Act and the Rules therein;
- iv. recommend the amount of expenditure to be incurred on the CSR projects;
- v. monitor the implementation of the CSR Policy from time to time and take such other action as it may deem fit in pursuance of the CSR Vision of CGCL.

C. Board of Directors:

- a. review the recommendations made by the CSR Committee, approve the CSR Policy of the Company or any amendments thereof and ensure that in every financial year the funds committed by CGCL for CSR activities are utilized effectively by regularly monitoring the implementation;
- b. Disclose the content of the Policy in CGCL's annual report and website as per the prescribed format. The Board of Directors shall also disclose the reasons for under spending of the allocated CSR budget in the Board's report, if any;
- c. Ensure necessary annual reporting of CSR Policy to the Ministry of Corporate affairs, Government of India as per the prescribed format.
- d. The Director's Report shall include an annual report on CSR containing particulars as specified.

5. CSR MAINSTAY

CSR activities at CGCL shall be carried out directly and/or through Capri Foundation, a registered public trust under the Bombay Public Trust Act, 1950 or through any other institutes, NGOs, Government, Semi-government, trusts etc.

6. CSR ACTIVITIES

The scope of CSR activities of CGCL will cover the following areas as enumerated under Schedule VII of the Companies Act, 2013

Sl. No.	CSR Thrust Areas	CSR Projects / Initiatives	Ref. Sr. No. of Schedule VII of Companies Act, 2013
1	Education	<ol style="list-style-type: none"> a. Offering scholarship and financial assistance to meritorious students from underprivileged communities b. Developing, augmenting and supporting infrastructure in educational institutions c. Education for mainstreaming differently-abled d. Enabling E-Learning and Computer Education e. Providing financial assistance to recognized educational / Academic institutes f. Setting up and running Educational Institutions and Hostels, Financial support for Hostel infrastructure 	I, II, X, IX

		g. Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defense Research and Development Organization (DRDO), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).	
2	Health, Nutrition & Sanitation	a. Promotion of Sanitation and Safe Drinking water b. Providing financial assistance for treatment and supplementary medications to needy patients c. Setting up of medical unit and Hospitals d. Promoting maternal and child health e. Eradicating hunger and malnutrition	I
3	Livelihood	a. Training and Income generation activities for women, self-help groups, differently-abled b. Setting up a skill development institution c. Sponsoring candidates for skill development and vocational training program offered at identified institutions d. Livelihood Enhancement projects	II
4	Rural Development / Slum Area Development	a. Adoption/Rehabilitation of Village/Slum Communities b. Holistic Development of Rural/Slum communities	X, XI
5	Promotion of Sports	a. Provide access to sports related aids and equipment b. Training towards promoting rural sports, nationally recognized sports, Paralympic sports and Olympic sports	VII

6	Promoting gender equality and empowering socially backward groups	a. Women literacy programmes b. Setting up and strengthening of Self-help groups c. Setting up homes and hostels for women, orphans and senior citizens d. Awareness on Gender inequalities and reducing inequalities faced by socially	III
		and economically backward groups	
7	Ensuring Environment Sustainability	a. Activities towards conservation of natural resources b. Promoting sustainable environment, ecological balance, agroforestry	IV
8	Promotion of art and culture	a. Development of national heritage, local arts and handicrafts through training and financial support. b. Setting up public libraries	V
9	Animal Welfare	a. Activities towards welfare of Animal	IV
10	Emergency/Disaster relief support	a. Disaster management, including relief, rehabilitation and reconstruction activities	XII
11	All the CSR related activities prescribed in Schedule VII	a. as prescribed in Schedule VII of the Companies Act 2013	Schedule VII of the Companies Act 2013

such other activities as the Committee and the Board of Directors may consider to be appropriate.

7. IMPLEMENTATION

- a. CGCL will seek to identify suitable programmes for implementation in line with the CSR vision and thrust areas of the Company. The approved projects will be implemented by:
 - i. CGCL
 - ii. Capri Foundation
 - iii. Any other institutes, NGOs, Government, Semi-government, trusts etc.

Further CGCL can also undertake its CSR projects or activities in collaboration with other companies provided the respective companies are in a position to report separately on such projects or programs.

Support or donations aligned with CGCL's CSR activities or as covered by the CSR guidelines under the statute would also be considered as CSR expenditure.

- b. The time period/duration of each project/programme shall depend on its nature, extent of coverage and intended impact of such activity.
- c. The investment in CSR shall be project based and for every project time period, periodic milestones shall be finalized by the CSR Committee from time to time in consultation with the related implementation team.
- d. The CSR spend would include building capacities of CGCL's personnel as well as their implementing agencies and travel & logistics for the purpose of project implementation.

8. MONITORING AND REPORTING

The CSR Committee shall ensure that each project/ programme shall have:

- i. Clearly defined objectives (developed out of existing societal needs determined through baselines/Secondary information/Primary Assessments), targets and time lines.
- ii. A robust progress monitoring system. In order to closely monitor and manage the field action projects, the CSR team at the Corporate Office will conduct periodic field visits, impact studies and social audits on a periodic basis.
- iii. CSR spends will be closely monitored and funds shall be released against verified utilizations as per the approved work plans.
- iv. A reporting framework and system in alignment with the Act and Rules

CGCL shall through its internal controls, monitoring and evaluation systems implement, assess, document and report the impact of its CSR activities/projects.

The CSR Committee Members will be informed about the progress of the CSR activities at the CSR Committee meetings held from time to time.

9. SURPLUS OF CSR PROJECTS

In line with the guidelines provided under the Act and Rules, surpluses, if any, arising out of the projects or programs or activities shall not form part of the business profit of CGCL.

10. DISCLOSURES

The CSR Team will prepare the Annual CSR Report to be filed by the Company on approval of the Board of Directors. This Report shall include the details of annual CSR activities, executing partners, and expenditure entailed for each financial year, and any other information as required by the prevailing law.

11. APPLICABILITY

This Policy has been revised to incorporate the amendments in the Companies Act, 2013 and shall be effective from November 8, 2019. In case there are any modification(s) / amendment(s) / notification(s) / Circular(s) to the Companies Act, 2013 and Rules made thereunder, it shall apply to this Policy automatically and this Policy shall stand amended automatically.