

# **CSR POLICY**

**For Winro Commercial (India) Limited**

**WINRO COMMERCIAL (INDIA) LIMITED**

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# WINRO COMMERCIAL (INDIA) LIMITED

## Corporate Social Responsibility (CSR) Policy

### 1. PREAMBLE:

At Winro Commercial (India) Limited (WCIL or 'the Company') we sincerely believe that the actions of the organization and its community are highly inter-dependent. Both on its own and through constant collaborative interactions with our external stakeholders, **WCIL** strives to become an asset in the communities where it operates.

As our **Corporate Social Responsibility (CSR)** we actively support the Projects and initiatives for the betterment of society, communities, and the health care, education.

### 2. SCOPE AND APPLICABILITY:

This policy shall be applicable to all CSR initiatives and activities undertaken by all the employees of WCIL for the benefit of different segments of the society.

### 3. MISSION:

Driving positive impact in communities.

### 4. OBJECTIVE OF CSR POLICY:

The objective of this policy is to continuously and consistently:

- Generate goodwill in communities where WCIL operates or are likely to operate;
- To support the activities/programs/ projects that benefit communities specially the areas like health care, education etc;
- Encourage an increased commitment from employees towards CSR activities and volunteering.

### 5. RESOURCES

The **Corporate Social Responsibility Committee ('CSR Committee' Board level)** is responsible to formulate and recommend to the Board the CSR Policy indicating the activities falling within the purview of Schedule VII to the Companies Act, 2013, to be undertaken by the Company, to recommend the amount to be spent on CSR activities and to monitor the CSR Policy periodically.

#### 5.1 Funding and Allocation:

For achieving the CSR objectives through implementation of meaningful and sustainable CSR Projects, the CSR Committee will allocate for its Annual CSR Budget, atleast 2% of the average net profits of the Company made during the three immediately preceding financial years, calculated in accordance with the relevant Sections of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

## **5.2 Volunteering of employees from the organization**

The Company will encourage and recognize its employees for volunteering with the spirit of serving and sharing with the community.

The Company shall endeavor to increase employee participation at all levels in the Organization, by encouraging employees to participate in the Company's CSR activities.

## **6. CSR Thrust Areas**

The Company has identified CSR Thrust Areas for undertaking CSR Projects/ programs/ activities in India. The actual distribution of the expenditure among these thrust areas will depend upon the local needs as may be determined by the need identification studies or discussions with local government/ NGOs. The Company shall give preference to the local area and areas around which the Company operates for CSR spending.

### **6.1 Thrust areas:**

- Education
  - Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- Health
  - Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water.
- Environment
  - 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.
- Others
  - Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
  - 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.
  - Measures for the benefit of armed forces veterans, war widows and their dependents.
  - Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports.
  - 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.
  - Contribution or funds provided to technology incubators located within academic institutions which are approved by the central government
  - Rural development projects.

- Any other activities that the CSR Committee of the Company may define from time to time.

## **7. Implementation**

- The Company will implement its CSR activities in accordance with Section 135 of the Companies Act 2013 and rules notified thereafter. The Company may undertake and/or initiate CSR activities through registered Trust/ Company under section 8 of the Companies Act 2013.
- Company has identified few trusts one of which is Aroni Charitable Trust, a registered Charitable Trust for carrying out its CSR activities.
- The CSR Committee shall provide guidance on the allocation of the CSR budget among the thrust areas on an annual basis.
- CSR Projects will be undertaken based on the recommendation of the CSR Committee to the best possible extent, within the defined Thrust Areas.
- WCIL's support to any activity/program/project will depend on the scale of the activity/program/project and feasibility of the activity/program/project. The CSR Committee will evaluate the project progress and impact quarterly.

## **8. Monitoring process of CSR activities**

- It will be the responsibility of the CSR committee to monitor periodically the implementation of the projects/programmes/activities under this CSR policy.
- Annual CSR Calendar activities will be cleared/ signed off by CSR Committee.
- Any other donations will be cleared/ signed off by Director / CFO.
- The Board of Directors will monitor and review on a quarterly basis the progress of CSR activities undertaken/ completed.
- All the CSR initiatives of the Company will form part of the Directors' Report and also be reported in the Sustainability Report of the Company.
- The CSR committee may delegate to such work and authority to such person as it may deem fit for ensuring the smooth functioning of the committee.

## **9. Criteria for identifying CSR projects:**

While identifying the projects all efforts must be made to the extent possible to define the following:

- a. Project objectives.
- b. Baseline survey – It would give the basis on which the outcome of the Activity/ Program/ Project would be measured.
- c. Implementation schedules- Timelines for milestones of the Activity/Program/Project will need to be prescribed.
- d. Responsibilities and authorities.
- e. Major results expected and measurable outcome.

## 10. Criteria for identifying Non-Governmental Organizations (NGOs)

While identifying Activity/Program/Project we will also identify the external agency (NGO) who would execute the said Project. In case of Project execution by them the following minimum criteria need to be ensured:

- The NGO / Agency has a permanent office in India;
- The NGO is a registered society under Societies' Registration Act / Public Trust Act/ not-for-profit company under Section 8 of the Companies Act, 2013 (erstwhile Section 25 of the Companies Act, 1956);
- Possesses a valid Income-tax Exemption Certificate;

The Company may also collaborate with other companies to undertake CSR Projects or Programs, provided the CSR Committees of the respective companies are in a position to report separately on such projects or programs.

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