

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. Applicability

Constitution of Corporate Social Responsibility Committee (the “Committee”) is applicable as **M/s. Growing Opportunity Finance India Private Limited** (the “Company”) met one of the criteria under Section 135 of the Companies Act, 2013 (“the Act”) that is net profit for the Financial year 2016-17 has exceeded Rs.500,00,000 (Rupees Five Crores).

2. Purpose

The purpose of the Committee of the Board of Directors of M/s. Growing Opportunity Finance India Private Limited shall be to assist the Board and the Company in fulfilling its corporate social responsibility.

The company’s CSR vision

“Enriching the lives of the underprivileged and be a partner in creating a happier Society”

3. CSR Budget

The company shall endeavor to spend, in every financial year, at least 2% of the average net profit made during the immediately preceding three financial years or such amount as may be determined from time to time on its CSR projects

Net profit shall mean profit before tax as per books of accounts.

4. CSR Governance Structure and Roles and Responsibilities.

The Company has put in place the following governance structure to ensure that CSR policy is implemented and monitored effectively. The roles and responsibilities are defined at each governance level:

Board of Directors

The Company’s Board of Directors will be responsible for following activities as per sub-section (1):

- Approve CSR policy, identify the causes that the Company proposes to support, and identify the programs to be undertaken by the Company, approve modalities of operation and the budget for the activities.
- Ensure that the activities included in CSR Policy of the Company are undertaken by the Company, although primary responsibility lies with the Committee.
- Make best effort that the Company spends, in every financial year, at least two percent of the average net profits made during the immediately preceding three financial years or such amount as may be determined from time to time by the Company, in pursuance of this policy.
- The Committee will have at least two (2) members from the Board of Directors.

CSR Committee

The Committee will be specifically responsible for the following:

- Ensure that the CSR Policy of the Company is monitored on a regular basis and is updated from time to time for any change or enhancement in scope and the same is recommended to the Board for approval.
- Approve the design of the CSR activities and the budgets proposed by any implementing partners and recommend to the Board for approval.
- The committee will give strategic direction, finalize and approve annual goals of the CSR programs selected, allocate budgets on a yearly basis and monitor progress.

5. Composition of CSR Committee

The Committee shall not consist of less than three (3) members, unless the number of board has been reduced to two (2). The members of the Committee shall be appointed/reconstituted by and will serve at the discretion of the Board.

The CSR Committee consist of the following members:

- Mrs. Johshy Tewes
- Mr. Saneesh Singh
- Mr. J. Daniel Prem Kumar

6. Meeting and Quorum

The committee shall meet at least one (1) time a year. Two members present shall form the quorum for the meeting of the Committee.

7. Modalities of Implementation

The Company will implement the CSR programs either through itself or through its associate NGOs or through a Trust or Section 8 Company or Society or Foundation or any other entity operating within India in accordance with its stated policy.

Implementation of CSR programs would be undertaken by implementation partners with an established track record.

While availing services of any other organizations, the Company will seek proposals and will then make a decision based on criteria which are critical to the success of that particular CSR program.

8. Program Implementation Guidelines

The Company will aim to follow the below guidelines in executing CSR projects:

Program Development

Every program must develop a proposal including information such as project description and duration, measurable objectives, information about the partner organization including proof of legal status, and amount of funding or other resources required.

Program Approval

The program proposals must be submitted to the Committee for their consideration and evaluation and thereafter to the Board for their approval. The programs will be implemented after receiving approval from the Committee.

Program Implementation

The total costs for all projects will be within the CSR budget as per the mandate or as approved by Board of Directors.

Program Criteria

All CSR interventions will have a project-based approach and wherever applicable, will comply with the items specified in Schedule VII of the Section 135 of the Companies Act, 2013 and the rules framed therein or as modified from time to time. Projects will be designed to fulfil strategic criteria according to relevant Company policies and frameworks.

9. Monitoring and Reporting Framework and Communication

The Committee shall meet to monitor the progress of CSR programs, CSR spending, and review if any changes are required. The Committee will also review the CSR policy to discuss if any changes are required in it.

The Company will be communicating its CSR efforts to all its employees and external stakeholders through emails, its own website, and other appropriate dissemination channels.

The CSR Policy of company will also be uploaded on the website of the Company.

10. Inclusions

Activities which may be included by companies in their Corporate Social Responsibility Policies activities relating to:

- 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 vocational 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 clean Ganga fund set-up by the Central Government for rejuvenation of river Ganga).

- v. 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 art and handicrafts;
- vi. measures for the benefit of armed forces veterans, war widows and their dependents;
- vii. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports.
- viii. 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 schedule caste, tribes, other backward classes, minorities and women;
- ix. contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government.
- x. Rural development projects.
- xi. Slum area development.
(Explanation – For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.)

11. Exclusions

The following activities shall not form part of the Company's CSR activities:

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

12. Exceptions/deviations

All exception and deviation to this policy shall be approved by the Committee.

13. Policy Owners

The Committee is the process owner of this Policy.

14. Amendments

Based on the recommendation of the Committee, the Board of the Company can modify this Policy unilaterally at any time to maintain compliance with Companies Act, 2013 from time to time.