

Corporate Social Responsibility Policy
Mintifi Private Limited
Version Control: 1.0 (FY23-24)

Line of Business	Compliance Department
Approving Authority	Board of Directors
Date of Approval	28 th March 2023

1. INTRODUCTION

Mintifi Private Limited is incorporated under the provisions of the Companies Act, and have prepared this policy in accordance with the provisions of the Companies Act, 2013 read with The Companies (Corporate Social Responsibility Policy) Rules, 2014 as may be amended from time to time.

2. OBJECTIVE AND SCOPE

In pursuance to the provisions of section 135 of the Companies Act, 2013 read with rules made thereunder as may be amended from time to time, this policy is being prepared to act as a guiding document for enabling the Company to undertake its CSR Activities. The policy will contain inter alia areas permissible areas which company can identify for fulfilling the CSR obligations, monitoring of the same, reporting requirements, disclosure and other ancillary or incidental matter related thereto.

3. DEFINITION

“**Act**” means the Companies Act, 2013, as amended from time to time.

“**Board**” means Board of Directors of the Company.

“**CSR**” means Corporate Social Responsibility.

“**CSR Rules**” means Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time;

“**CSR Committee**” means the Corporate Social Responsibility Committee constituted by the Board of Directors pursuant to Section 135 of the Act;

“**Implementing Agency**” shall mean the following

(a) A company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company; or

(b) A company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or

(c) Any entity established under an Act of Parliament or a State legislature; or

(d) A company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

Note: Implementing agency will have to satisfy the criteria of registration as prescribed under the CSR Rules as may be amended from time to time.

“**Net profit**” shall means profit calculated in in accordance with the provisions of section 198 of the Act.

Definitions not defined herein above will carry the same meaning as assigned to them under the Act or CSR Rules.

4. CORE AREAS

Activities which may be contemplated by the Company for meeting its CSR obligations will be as follows:

- ❖ 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.
- ❖ Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- ❖ 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.
- ❖ 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.
- ❖ 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;
- ❖ Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows
- ❖ Training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports
- ❖ 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;
- ❖ 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
- ❖ Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST);

Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).

- ❖ Rural development projects
- ❖ 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.]

- ❖ Disaster management, including relief, rehabilitation and reconstruction activities.

5. **BOARD OF DIRECTORS:**

Board of Directors shall be responsible for the following:

- After taking into account the recommendations made by the CSR Committee, approve the Corporate Social Responsibility Policy for the company
- Ensure that the company spends, in every financial year, at least two per cent. of the average net profits of the company made during the three immediately preceding financial years in pursuance of its Corporate Social Responsibility Policy:
- Provide such disclosures (including disclosure in unspent CSR account) in Board report as may be required under the Act from time to time

For the purposes of this section “**net profit**” shall not include such sums as may be prescribed, and shall be calculated in accordance with the provisions of section 198.

6. **CSR COMMITTEE**

With the approval of the Board of Directors, the Company will constitute a CSR Committee in accordance with the provision of the Section 135(1) of the Companies Act, 2013 as may be amended from time to time.

The CSR Committee shall:

- Formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company in areas or subject, specified in Schedule VII of the Act
- Recommend the amount of expenditure to be incurred on the activities

- Monitor the Corporate Social Responsibility Policy of the company from time to time.
- Monitor the performance of the Implementing agency, if any.

On the recommendation of the CSR Committee, and based on the certificate submitted by the Chief Financial Officer of the Company, the Board of Director shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by Board.

7. IMPLEMENTATION

The Company will undertake its CSR activities through itself and/or with implementing agency as defined above.

8. IDENTIFICATION OF PROJECTS/AREAS AND ALLOCATION OF FUNDS

The management of the Company will present a proposal to the CSR Committee, who will review the same and in turn will send the proposal to the Board of Directors for their approval. It is hereby clarified that the company can undertake the CSR activities on its own and/or through its implementing agency in accordance with the plan approved in this regard including any modification(s) or amendment(s) thereto.

9. CSR REPORTING

The Board Report of the Company for each financial year shall include an annual report on CSR containing particulars as stipulated under the provisions of the CSR Rules and the Act.

10. AMENDMENT

Any amendment in this policy shall be done only with the approval of the Board of Directors. Notwithstanding anything contained herein, any subsequent amendment in the RBI regulations or any other applicable law in this regard, shall automatically apply to this Policy. Accordingly, this policy shall be duly revised to incorporate any amendments.

11. POLICY REVIEW

This Policy shall be reviewed by the Board of Directors at least once in every year, in order to align with the ongoing regulatory and business requirements.

12. DISCLOSURE:

This Policy shall be disclosed on the website of the Company.