

CORPORATE SOCIAL RESPONSIBILITY POLICY

MNS CREDIT MANAGEMENT GROUP
PRIVATE LIMITED



INTRODUCTION

MNS Credit Management Group Private Limited (herein after referred to as “**the Company**” or “**MNS**”) recognizes and believes that over the period, since the formation of the Company in the year 1996, it has been using the resources of the society in and around it and now when the Company has achieved a reasonable level of business operation, it is the time to give back to the society and improve the quality of life of people and environment around it. The Company being operating in the society has the responsibility towards it. Furthermore, it is like the fundamental duty of every organization towards the Society.

MNS also believes and preaches that the Company’s performance must be measured by its contribution to building economic, social and environmental capital towards enhancing social sustainability.

MNS has the tremendous opportunity to bring the great developments towards achieving the new business benchmark i.e., a socially sustainable business. A business ventures which operate “in the society, with the society and for the society.”

The CSR initiative is independent of the normal conduct of the Company. Programs, projects and activities, carried out by the Company are subject matter of this policy.

OUR VISION

- I. The Company completely endorses reliability. It is committed to conduct business in a true, fair and ethical manner and takes up the responsibility to create a good impact in the society it belongs.
- II. The Company is committed towards improving the quality of lives of people in the communities in which it operates because, the society is an essential stakeholder and the purpose of its existence. The Company believes that giving back to the society through CSR activities is its moral duty.
- III. The Company aims to fulfil the requirements laid down under the Companies Act, 2013 and act diligently to comply with all its Rules and Regulations on CSR.

SCOPE

The CSR activities of the Company shall include, but not limited to any or all of the sectors/activities as may be prescribed by Schedule VII of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014 (the Rules) and amendments thereunder along with Clarifications issued by the Ministry of Corporate Affairs from time to time with regard to provisions of Corporate Social Responsibility under section 135 of the Companies Act, 2013.

This Policy has been formulated under the above provisions of the Act and shall be applicable to all CSR initiatives and activities undertaken by the Company, for the benefit of different segments of society.

CORPORATE SOCIAL RESPONSIBILITY (CSR) COMMITTEE

- I. Pursuant to the provisions of Section 135 of the Act, the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The Members of the CSR Committee shall be appointed by the Board of Directors of the Company which must consist of two Directors. The Constitution of CSR Committee shall be disclosed in the Board Report of the Company.
- II. The CSR Committee may delegate its responsibility to any senior or key managerial person(s) or a sub-committee as and when deemed fit for implementation of CSR Programs. The key managerial person(s) or a sub-committee shall work under the supervision of the Board, the CSR Committee and report the activities and expenditures in accordance with this Policy and the Companies Act, 2013.
- III. The Board shall reconstitute the CSR Committee as and when required to comply with the provisions of the Companies Act, 2013 and applicable statutory requirements or on movement of Directors from the Board.

MEETINGS

The CSR Committee shall hold meeting as and when required either in person or through video conferencing, to discuss various issues on implementation of the CSR Policy of the Company. The members would thrive to hold at least two meetings in a financial year. The Committee shall periodically review the implementation of the CSR Programmes and issue necessary direction from

time to time to ensure orderly and efficient execution of the CSR Programmes in accordance with this Policy. It would be the responsibility of the CSR Committee to periodically keep the Board apprised of the status of the implementation of CSR activities.

The quorum for the CSR Committee Meeting(s) shall be 2 members. The CSR Committee may transact the business through passing of circular resolutions.

FUNCTIONS OF CSR COMMITTEE

The functions of CSR Committee shall, inter-alia, include the following:

- I. To formulate and recommend to the Board, a CSR Policy which shall indicate the activities to be undertaken by the Company or contributions to be made to eligible funds/Institutions pursuant to the provision of the Act;
- II. To recommend CSR activity/program/project to the Board for its approval;
- III. To review and recommend the amount of expenditure to be incurred on the activities to be undertaken by the Company;
- IV. To monitor the CSR Policy of the Company from time to time;
- V. To review the CSR activities of the Company and provide progress update to the Board of Directors at such interval as may be deemed fit.

Any other matter as the CSR Committee may deem appropriate after approval of the Board of Directors or as may be directed by the Board of Directors, from time to time.

IDENTIFICATION OF CSR ACTIVITIES

The Company is eligible to undertake any rightful/suitable activity as specified in Schedule VII of the Act. At present, the Company shall focus to undertake all the activities as Thrust Areas which are reproduced below:

A. Eradicating hunger, poverty and malnutrition through:

- Promotion of sanitation and making available safe drinking water, including contribution to the Swachh Bharat Kosh set up by the Central Government;

- Provision of food, nutrition supplements, clothes, etc. for the poor, under-privileged children and other deprived and weaker sections of the society;
- Provision of safe shelter for homeless, abandoned or differently disabled children and adults including tribals and others as may be covered by the Pradhan Mantri Awas Yojana or otherwise.

B. Promoting healthcare including preventive healthcare through:

- Organisation of awareness programmes for prevention of female foeticide and road accidents;
- Organisation of health check-up camps for diseases prevention, early detection and building immunity;
- Provision of end-to-end access to affordable and quality healthcare for socially and economically backward classes;
- Provision for construction and operation of medical hospitals, colleges and institutions for promotion of healthcare activities, facilities and initiatives;
- Promoting social business projects like giving medical aid, appliances, support and treatment to disabled persons, people suffering from cancer or any other critical illnesses or such other sections as the CSR Committee may decide.

C. Ensuring environment sustainability and ecological balance through:

- Promotion of community conservancy for reducing man-animal conflict, increasing India's forest cover and conserving natural resources;
- Adoption of wastelands to cultivate plants and preserve the flora and fauna;
- Plantation drives in schools, colleges, villages, public spaces, business premises and other areas.

D. Supporting skill development and generation of employment through:

- Provision of life skills to children, youth and adults thereby boosting their confidence and improve their employability;
- Organization of locally driven skilling initiatives for vocational training for all sections of the society;

- Supporting educational needs of students that help them develop employment skills.

E. Promoting education especially among children, women, elderly and the differently abled through:

- Adoption of non-formal school programmes and other educational institutions;
- Provision of educational and material assistance to under-privileged girls to build an educated and literate female population;
- Institution of infrastructure in schools like benches, toilets, potable water, fans, security cameras, etc. and improvisation of educational facilities;
- Providing financial and/or other assistance to any Agency involved in education, knowledge enhancement and sports.

F. Contribution to 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 Schedule Tribes, other backward classes, minorities and women.

IMPLEMENTATION OF THE CSR ACTIVITIES

The Company shall implement the identified CSR activities by the following means:

- The Company may itself implement the identified CSR activities presently within the scope of the Thrust Areas as defined in the Policy;
- The Committee may undertake the CSR activities through following implementing agencies:
 - I. A Registered NGO
 - II. A Registered Public Trust;
 - III. A Registered Society
 - IV. A Company established under Section 8 of the Act;

CSR EXPENDITURE

The annual CSR budget would be approved by the Board on the recommendations of the CSR Committee, subject to the provisions of the Act and Rules made thereunder as amended from time to time.

Based on the total approved budget, funds would be allocated for different projects on the basis of identified CSR plan on yearly basis.

The average net profit for the purpose of determining the spending on CSR activities is to be computed in accordance with the provisions of section 198 of the Act and will also be exclusive of the items given under rule 2(1)(h) of the Companies (CSR Policy) Rules, 2014.

Section 198 of the Act specifies certain additions / deletions (adjustments) to be made while calculating the net profit of a Company (mainly it excludes capital payments / receipts, income tax, set-off of past losses).

QUANTUM OF CSR INVESTMENT

In pursuant to the provisions of Section 135(5) of the Act, the CSR Committee of the Company shall ensure that the Company spends in every Financial Year, at least 2% (Two Percent) of the average Net Profits of the Company made during the three immediately preceding Financial Years on the CSR activities of the Company specified under Schedule VII of the Act.

EXCLUSION FROM CSR ACTIVITIES

The following activities are specifically excluded from being considered as eligible CSR activity and shall not form part of the CSR activities of the Company:

- Any CSR activities undertaken in pursuance of normal course of business of a Company except research and development activity of new vaccine, drugs and medical devices related to COVID-19 for Financial Years 2020-21, 2021-22, 2022-23 subject to the conditions;
- Any CSR activities which benefit only the employees of the Company and their families as defined in section 2(k) of the Code on Wages, 2019;

- Any CSR projects/programs undertaken outside India except for training of Indian sports personnel representing any State or Union Territory at national level or India at international level;
- A contribution of any amount directly or indirectly to any political party under section 182 of the Act or any funds directed towards political parties or political causes;
- Any sponsorship activities for deriving marketing benefits for products / services;
- Any activities for fulfilling statutory obligations under any law in force in India.

REVIEW & AMENDMENT OF CSR POLICY

The Board of Directors of the Company shall have the powers to revise / modify / amend this Policy from time to time, as the Board may think fit, based on the recommendations to be made by the CSR Committee.

Any subsequent amendment / modification in the CSR Rules made by the MCA, under the Act and / or any other laws in this regard shall automatically apply to this Policy.

GENERAL

- Words and expressions used but not defined in this Policy shall have the same meaning assigned to them in the Companies Act, 2013, the CSR Rules made thereunder or in any amendment thereto. This Policy shall also be subject to such clarifications and FAQs as may be issued by MCA from time to time.
- In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference should be made to Corporate CSR Department. In all such matters, the interpretation & decision of the CSR Committee shall be final.
- Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued from the Government, from time to time.

END OF DOCUMENT