JAINAM BROKING LIMITED

(CIN: U67120GJ2003PLC043162)

Corporate Social Responsibility Policy

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1. Philosophy

Jainam Broking Limited **("JBL" or "the Company")** has been an early adopter of Corporate Social Responsibility ('**CSR**') initiatives. Along with sustained economic performance, environmental and social stewardship is also a key factor for holistic Business growth. JBL believes in developing business with eco-friendly and sustainable manner which includes development of all society & community. The company's focus has always been to contribute to the sustainable development of the society and environment and to make our planet a better place for future generations.

- **Our CSR Vision**
  JBL Believe in creating synergies with our partners in growth and success. We are committed to augment the overall economy and social development of the local communities by discharging our responsibilities in a sustainable manner.
  The Policy will assist and promote our suppliers and Vendors in adhering to its imperatives.

- **Our CSR Mission**
  Be committed to sustainable actions and contribute meaningfully to the Triple Bottom Line (social, economic and environment) performance.

- **Our Values:**
  JBL believes in Integrity, Respect and Recognition, Passion for Excellence, Working Together with all the people.

2. Terms of Reference:

(a) To formulate and recommend to the board, a corporate social responsibility policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act and the rules made thereunder and make any revisions therein as and when decided by the Board;

(b) To identify corporate social responsibility policy partners and corporate social responsibility policy programmes;

(c) To recommend the amount of expenditure to be incurred for the corporate social responsibility activities and the distribution of the same to various corporate social responsibility programmes undertaken by the Company;

(d) To formulate the annual action plan of the Company;

(e) To delegate responsibilities to the corporate social responsibility team and supervise proper execution of all delegated responsibilities;

(f) To review and monitor the implementation of corporate social responsibility policy, corporate social responsibility programmes and issuing necessary directions as required for proper implementation and timely completion of corporate social responsibility programmes; and

(g) To perform such other duties and functions as the Board may require the corporate social responsibility committee to undertake to promote the corporate social responsibility activities of the Company and exercise such other powers as may be conferred upon the CSR Committee in terms of the provisions of Section 135 of the Companies Act, as amended or other applicable laws.

3. CSR Activities:

The CSR activities we pursue will be in line with our stated Vision and Mission, focused not just around our offices, but also in other geographies based on the needs of the communities.

In accordance with the primary CSR philosophy and the specified activities under the Act read with Companies (Corporate Social Responsibility Policy) Rules, 2014 (the "CSR Rules"), and any amendment(s) thereof, the CSR activities of JBL will have the following thrust areas:

1. **Promoting Health care:**
    a. **Health Camps and Blood Donation Camps:**
        Regularly organizing of the health and medical camps across various locations to help, facilitate the needy peoples to avail medical services either free of cost or at negligible rates.
    b. **Medicine Donations:**
        The company often joins hands with various organizations which conduct medical camps in villages and at various places across the nation. Help is provided by donating the medicines for the camps and bearing the entire cost, helping needy patients to avail free medicines to take care of their health.
    c. **Spending of CSR funds for COVID-19**

2. **Eradicating Hunger, Poverty and Malnutrition:**
    a. Providing food, nutrition and cloths to poor
    b. Providing safe drinking water
    c. Providing shelter for homeless
    d. contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation
    e. slum area development

3. **Promoting Education**:
    a. Supporting various educational institutions with infrastructure like toilets, water, fans, etc
    b. Provide stationary items to children
    c. Providing financial assistant to children for education
    d. Arrange vocational training specially for children, women, elderly and differently able

4. **Promoting gender equality and empowering women by:**
    a. Setting up homes and hostels for women and orphans
    b. Setting up old age homes
    c. Day care centers for senior citizen

5. **Environment protection:**
    a. Conservation of natural resources
    b. Maintain quality of soil, air and water
    c. Protection of flora and fauna
    d. Animal welfare
    e. Arrange and hold program for plantation of trees at school, colleges, village and other area
    f. Contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga

6. **Rural development projects**

7. **Contribution or funds provided to technology incubators located within academic institutions which are approved by Central Government**

8. **Other Activities:**
    a. Protection of national heritage
    b. Setting up public libraries
    c. Promotion and development of traditional arts and handicrafts
    d. Promoting rural sports, nationally recognized sports, Paralympic sports and Olympic sports
    e. Measures for the benefit of armed forces veterans, war widows and their dependent
    f. Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows
    g. 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
    h. Disaster management, including relief, rehabilitation and reconstruction activities.

4. Implementation:

Corporate Social Responsibility of the Company shall be conducted as following:

a. Through a company registered under section 8 of the Companies Act, 2013 (corresponding section 25 of the Companies Act, 1956); or
b. Through a Registered public trust or a registered Society registered under section 12A and 80 G of the Income Tax Act, 2016 established by the company itself or along with other company or either formed by the Central Government or State Government; or
c. Through an entity established under an Act of Parliament or a State legislature.

Further, the CSR shall be carried out only through the said company, public trust or a society who is having an established track record of minimum three years in carrying out the similar CSR activities and also have registered with the Central government by complying the necessary norms.

5. Monitoring:

Compliance of CSR policy will be continuously monitored by the CSR Committee at its meeting(s).

The Board of the Company shall ensure that the CSR funds so disbursed have only been utilised for the approved purposes and in stated manner only; the Chief Financial officer or the concerned person responsible for the financial management of the company shall certify on the same.

As and when the company having an ongoing CSR project; the Board of the Company shall monitor that the implementation of the same in in line with approved timelines and the year wise allocated CSR budgets. Further, the Board of the Company shall have the power to make necessary modifications for the smooth implementation of the said project and to comply with the overall permissible time period.

The company as and when having an average CSR contribution of rupees ten crore or more in the three immediately preceding financial years; it shall undertake an impact assessment of the same through an independent agency of the CSR project(s) which is/ are having an outlay of one crore rupees or more, and

which have been completed not less than one year before undertaking the said assessment.

The Impact Assessment reports shall be placed before the Board and shall be the part of the Annual report.

6. Reporting:

The content of this policy shall be disclosed in the Board report and placed on Company's website. Compliance will be reported to stakeholders through the Company's Annual Report.

The Board shall ensure spending of allocated amount on CSR activities and report of the same in Annual Report of the Company.

7. Composition of CSR Committee:

The CSR Committee shall consist of the following Directors:

- Mrs. Vidhi Dishant Parikh – Chairman
- Mrs. Anal Milan Parikh – Member
- Mr. Bhuvnesh Vilayatrani –Member

8. Budget:

Mandatory annual spending for CSR activities in any particular financial year shall be 2% of the average of annual net profit of the preceding three financial years.
The corpus of the CSR activities would include the following amounts:

- 2% of the average net profits;
- any income arising therefrom
- surplus arising out of CSR activities; The surplus arising out of the CSR activities not be part of business profits of the company.

As and when the company spends an amount in excess of the CSR specified requirements, the company can set off such excess amount against the said requirements to spend for such number of succeeding financial years and in such manner as specified by the Central government.

9. Annual Action Plan:

The CSR committee shall formulate an Annual action plan for the CSR of the company and shall recommend the same to the Board for the approval and its execution.

The Annual Action Plan shall include the following:

- the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- the manner of execution of such projects or programmes in compliance with the rule 4(1) of the Companies (Corporate Social Responsibility Policy) Rules, 2014.
- the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- monitoring and reporting mechanism for the projects or programmes; and details of need and impact assessment, if any, for the projects undertaken by the company

Further, as and when the recommendations are received from the CSR committee and on the basis of the reasonable justifications thereof; the Board can at any time make necessary alterations in the said plan.

10. Power for Approval:

CSR Committee shall recommend the Annual Action Plan along with the proposed activities to the Board of the Company.
The Board of the Company shall approve the Annual Action Plan along with the proposed CSR activities in their duly held meeting.

11. Unspent CSR Funds:

Ongoing Projects:

Any amount remaining unspent under pursuant to any ongoing project, fulfilling such conditions as may be prescribed, undertaken by a company in pursuance of its Corporate Social Responsibility Policy, shall be transferred by the company within a period of thirty days from the end of the financial year to a special account to be opened by the company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.

The Unspent CSR fund unless it's being related to ongoing project(s); shall be mandatorily be transferred by the company within six months from the end of the financial year to the fund(s) as specified by the Central Government in this behalf.

12. Meeting of CSR Committee:

The meeting of the CSR Committee shall be held at such time and place as and when required.

Quorum for CSR Committee:

- Quorum for the Corporate Social Responsibility Committee Meeting shall be one-third of its total strength (any fraction contained in that one-third be rounded off as one) or two members, whichever is higher.

Secretary for CSR Committee:

- The secretary of the Company shall be secretary of the CSR Committee

This policy is approved by the Board of Directors at their meeting held on _____

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