



CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

VENUS INDIA ASSET-FINANCE PRIVATE LIMITED

Corporate Social Responsibility is strongly connected with the principles of Sustainability; an The organization should make decisions based not only on financial factors but also on social and environmental consequences. Therefore, it is the core corporate responsibility of Venus India Asset-Finance Private Limited to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders.

Venus India Asset-Finance Private Limited recognizes that its business activities have a wide impact on the societies in which it operates, and therefore an effective practice is required giving due consideration to the interests of its stakeholders including shareholders, customers, employees, suppliers, business partners, local communities and other organizations. The company endeavors to make CSR a key business process for sustainable development. Venus India Asset-Finance Private Limited is responsible for continuously enhancing shareholder's wealth; it is also committed to its other stakeholders to conduct its business in an accountable manner that creates a sustained positive impact on society. Our company is committed to aligning with nature; and has adopted eco-friendly practices.

As a corporate entity, the company is committed to sustainability. Ongoing dialogues with shareholders provide a valuable approach with an objective that each business decision takes into account its social and environmental impacts and plans.

THE PHILOSOPHY

All CSR activities shall be driven by the core value of Inclusion. Venus India Asset-Finance Private Limited shall ensure that all developmental activities/ initiatives undertaken are accessible to the most marginalized segments such as children, women, the elderly, and those with disabilities. This would reflect particularly in the field of education, healthcare, sanitation, community welfare, skill development, employment generation, infrastructure development, promotion of national heritage & culture, etc.

The concept and need for Corporate Social Responsibility (CSR) have gained prominence from all avenues. The Government as well as regulators have framed various guidelines pertaining to the responsibilities of business as well as the mandatory Corporate Social

Responsibility provisions under the Companies Act, 2013 and Rules made thereunder ("Act"). The Board of Directors constituted the CSR Committee in its meeting held on November 11, 2014.

It is recognized that integrating social, environmental and ethical responsibilities into the governance of businesses ensures their long-term success, competitiveness and sustainability. This approach also reaffirms the view that businesses are an integral part of society, and have a critical and active role to play in the sustenance and improvement of healthy ecosystems, in fostering social inclusiveness and equity, and in upholding the essentials of ethical practices and good governance.

This policy encompasses the company's philosophy for giving back to society as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programs for the welfare & sustainable development of the community at large, is titled the 'Venus CSR Policy.

This policy shall apply to all CSR initiatives and activities taken up not only at the various work centers and locations of the Company but also in any other parts of the country, for the benefit of society.

PURPOSE

- ✓ To lay down guidelines to make CSR a key business process for the sustainable development of society. Ensuring the implementation of CSR initiatives in letter and spirit through appropriate procedures and reporting.
- ✓ To directly/indirectly undertake projects/programs which will enhance the quality of life and economic well-being of the communities in and around our facilities across the country and society at large.
- ✓ Establishing a guideline for compliance with the provisions of Regulations to dedicate a percentage of the Company's profits for social projects.
- ✓ To generate goodwill and recognition among all stakeholders of the company.

Words and expressions used in this CSR Policy and not defined herein but defined in the Act shall have the meaning respectively assigned to them in the Act

POLICY / CSR ACTIVITIES

The Policy recognizes that Corporate Social Responsibility is not merely compliance; it is a commitment to support initiatives that measurably improve the lives of the underprivileged by one or more focus areas as prescribed under Section 135 read with Schedule VII of the Companies Act 2013 and the Companies (Corporate Social Responsibility Policy) Rules 2014.

ANNUAL SPENDS / ALLOCATION OF FUNDS

The Company would spend not less than 2% of the average Net Profits of the Company made during the three immediately preceding financial years. The surplus arising out of the CSR activity will not be part of the business profits of the Company. The Corpus would thus include the 2% of average net profits, as aforesaid, any income arising therefrom and surplus arising out of CSR activities.

The Company may build CSR capacities of its personnel and/or those of its implementing agencies through Institutions with established track records of at least three financial years but such expenditure shall not exceed five percent of the total CSR expenditure of the Company in one financial year.

CSR COMMITTEE



Guiding Principles for Constitution of CSR Committee:

Being a Private Company, the CSR Committee will consist of two directors. The Committee will meet at least twice a year to discuss and review CSR activities and Policy. A quorum of two members is required to be present for the proceedings to take place. Such other meetings of the Committee can be convened as and when deemed appropriate. The Committee members may attend the meeting physically or via such audio-visual means as permitted under the Act. The Committee shall have the authority to call such employee(s), senior official(s) and or externals, as it deems fit. The Company Secretary shall act as Secretary to the Committee.



Committee Members:

- 1 Mr. Gaurav Goel
- 2 Dr. Doraiswamy Srinivas
- 3 Ms. Perna Bajaj

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Functions of CSR Committee:

The CSR Committee will carry out the following functions:

- a. to formulate and recommend to the Board, a CSR policy indicating activities to be undertaken as specified in Schedule VII of the Act;
- b. to delegate the power to CEO of the Company to spend the amount on CSR activities referred above, up to Rs. 20,00,000/- (Rupees Twenty Lakhs) and the amount more than Rs. 20,00,000/- (Rupees Ten Lakhs) to be spent on each CSR activity will remain with CSR Committee.
- c. to monitor the CSR policy from time to time.

Such other activities as directed by the Board of Directors of the Company and/or as deemed appropriate and expedient by the Committee for the furtherance of CSR objectives of the Company, in pursuance with the Regulations.

CSR PROJECTS APPROVED BY THE BOARD

Venus India Asset-Finance Private Limited has supported a number of projects that have helped the needy and provided support to the weakest sections of our society. We have focussed on the rural areas where facilities have been lacking, and also on poor people who do not have access to some of life's basic necessities.

The company will spend the CSR amount on the activities as prescribed under Section 135 read with Schedule VII of the Companies Act 2013 and the Companies (Corporate Social Responsibility Policy) Rules 2014 or other areas or activities as may be prescribed by the Ministry or the Government from time to time.

Some of the key activities where the company will spend the CSR amount are as follows:-

1. 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.
2. Promoting education, including special education and employment enhancing vocation skills, especially among children, women, elderly and the differently abled and livelihood enhancement projects.
3. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, daycare centers and such other

facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.

4. Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining the quality of soil, air and water [including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
5. 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.
6. 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.
7. Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports.
8. 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 scheduled caste, tribes, other backward classes, minorities and women.
9.
 - (a) 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
 - (b) Contributions to public-funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under the 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.
10. Rural development projects research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
11. 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.

12. Disaster management, including relief, rehabilitation and reconstruction activities.

13. Any other activity as may be prescribed by the Government from time to time.

REVIEW AND REPORTING

The CSR Committee will review the philanthropic activities of the Company and will provide a progress update to the Board of Directors.

The Company will report, the details of CSR initiatives and activities in the Directors' Report and on the website of the Company, as required under the Regulations.

MONITORING

Appropriate documentation and amendments of the CSR Policy, annual CSR activities, reports on execution by CSR Partner(s) and expenditures will be undertaken on a regular basis and the same will be available to the Board of Directors of the Company.

The CSR Committee and persons /entities authorized by it will conduct due diligence checks on the current projects/partners and report anomalies, if any, immediately. Based on the analysis of projects, the CSR Committee will carry out roadmap planning for the allocation of budget and selection of projects. The same will be done at least once in a financial year.

AMENDMENTS TO THE POLICY

The Board of Directors on its own and/or as per the recommendations of the CSR Committee can amend this Policy, as and when required as deemed fit. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the Act on the subject as may be issued from relevant statutory authorities, from time to time.