

# Corporate Social Responsibility Policy

## Nirmal Bang Securities Private Limited

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**CIN NO.: U99999MH1997PTC110659**

**Member : BSE, NSE, MSEI, MCX, NCDEX, ICEX SEBI Registration No. INZ000202536**  
**Exchange Registered Broker in BSE Currency Segment ,**  
**Exchange Registered Broker in BSE & NSE Commodity Segment**

## **1. Objective of the Csr Policy**

The Objective of the Policy is to define Companies Corporate Social Responsibility (CSR) approach in alignment with the terms of the Companies Act, 2013 (hereinafter referred to as 'the Act') read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (hereinafter referred to as 'the CSR Rules'), as amended from time to time.

## **2. Scope and Applicability**

This policy is applicable to Nirmal Bang and all CSR applicable Group Companies of Nirmal Bang .

## **3. Board-level CSR Committee :**

The Board level Corporate Social Responsibility Committee (CSR Committee) of the Company shall be responsible for formulating and recommending to the Board the CSR policy and a CSR annual action plan, provided that the Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on reasonable justification to that effect. The CSR Committee reports to the Company's Board of Directors.

The members of the Board Level CSR Committee are ***Mr.Kishore Mishrilal Bang*** (Chairperson & Managing Director), ***Mr. Dilip Mishrilal Bang*** (Managing Director), ***Mr. Rakesh Bhandari*** ( Director).

#### **4. CSR Approach & Guiding Principles:**

CSR initiatives of the Company are implemented by Nirmal Mishrial Bang Charity Trust -the implementing agency ,a registered Public trust with section 12A and section 80G registrations under the Income tax Act ,1961 having established track record of three Years. The Trust is registered with the Central Government having a unique registration no. CSR00006407.

All CSR projects will be in line with the CSR vision, as well as areas listed in Schedule VII of the Companies Act, 2013. It will not include the activities undertaken in pursuance of normal course of business of the Company, projects benefitting the employees of the Company (as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019) and as amended from time to time) or contributions of any amount directly or indirectly to any political party.

All CSR activities will be monitored under proper mechanism and recommendations of the Committee members .

The Company is committed to support the Csr activities undertaken in the following areas:

- Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water.
- Contribution towards medical aid, 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, agro forestry, conservation of natural resources and maintaining quality of soil, air and water; protection of national heritage and

culture including restoration of buildings and sites of historical importance and works of art;

- Setting up public libraries; promotion and development of traditional and handicrafts: measures for the benefit of armed forces veterans, war widows and their dependents;
- To Contribute for the socio-economic development and relief and welfare of the Scheduled Caste, the Scheduled Tribes, other backward classes, minorities and women, adoption of Schools in tribal / backward areas;.

To pursue CSR Programmes primarily in areas that fall within the economic vicinity of the Company's operations to enable close supervision and ensure maximum development impact;

To provide equal opportunities to beneficiaries of the Company's CSR Programmes as vendors or employees on merit.

## **5. Annual Action Plan**

On the basis of the guidelines prescribed in this Policy and in consultation with the Company's management and the Implementing Agency, the Committee shall formulate and recommend to the Board of Directors an annual action plan, at the first meeting of every financial year which may be adopted by the Board. The plan shall include the following :

- (a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act,
- (b) the manner of execution of such projects or programmes,
- (c) the modalities of utilisation of funds and implementation schedules

(d) for the projects or programmes, monitoring and reporting mechanism for the projects or programmes and

(e) details of need and impact assessment, if any, for the projects undertaken by the company.

## **6. IMPLEMENTATION:**

Depending on the annual action plan approved by the Board of Directors, the Company or the Implementation Agency will attend to the activities related to CSR.

The implementation schedule of various programs or projects or activities shall be within the purview of the act.

## **7. CSR EXPENDITURE:**

From April 1st, 2014, in line with the new Companies Act 2013 (the Act), Nirmal Bang. contributes at least 2% of the average net profits of the Company made during the 3 immediately preceding financial years specifically towards CSR initiatives. For this purpose, the net profit and average net profit shall be calculated in accordance with the provisions of section 198 of the Act read with the Companies (Corporate Social Responsibility Policy) Rules, 2014.

The excess amount arising out of the CSR activities will not be considered as a part of the business profits of the Company and such excess amount may be set-off against the requirement of the CSR Spending u/s 135(5) upto the immediate succeeding 3 financial year subject to the conditions that the Board of Directors shall pass a resolution to that effect.

Any unspent amount of not relating to the ongoing project shall be transferred to such a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

## **8. Governance and Monitoring Process:**

The Company has a well-defined and robust governance structure to oversee the implementation of the CSR Policy and monitoring of CSR projects as per the requirements of Section 135 of the Companies Act, 2013.

The CSR Policy as per the amended rules shall be uploaded on the Company's website for information of all stakeholders.

For and behalf of Nirmal Bang Securities Private Limited

Managing Director/Director