

OVERVIEW AND CSR PHILOSOPHY

BNK Securities Private Limited (“the Company”) believes in a philosophy of adopting sustainable business practices which are beneficial to various stakeholders including the society. Through its corporate values, the Company constantly endeavours to actively contribute to the social and economic development of the communities in which it operates. Along with sustained economic performance environmental and social stewardship is also a key factor for holistic business growth.

The Company has always believed in giving back to the society and recognized its role and responsibility as a corporate citizen. The Company has social values ingrained into its culture and manner of working.

To further the Company’s CSR philosophy, a formal policy on CSR is being formulated to align its practices with requirements of Companies Act, 2013 and rules made thereunder.

CSR PROJECTS, PROGRAMS AND ACTIVITIES

The Company may undertake various CSR projects, programs and activities through direct or through one or more Trust(s)/NGO(s) from time to time. The Company may also contribute towards any existing or ongoing CSR projects, programs and activities. Such projects, programs and activities will be undertaken keeping in mind the CSR philosophy of the Company and in alignment with the permissible activities under the Companies Act, 2013 and rules framed under (as amended from time to time). It shall be at the discretion of the Company to undertake, modify, implement and cancel CSR projects, programs and activities from time to time as it deems fit. The Company’s focus has always been to contribute to the sustainable development of the society & environment and to make our planet a better place for future generation.

The Company’s focus is to implement programme that aims at community development and inclusive growth, to undertake social responsibilities by promoting harmonious social development. The Company will focus its activities on assisting/providing in association with other persons, hostel & other accommodation facilities for deserving persons of the society.

Without prejudice to the generality of the aforesaid, the Company may from time to time undertake any project, program and activity on one or more of the following areas:

- 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 group;
- 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 Government for socio-economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- i. 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
 - ii. 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 Homeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defence Research and Development Organisation (DRDO); 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;
- disaster management, including relief, rehabilitation and reconstruction activities;

Further, in accordance with the law, below mentioned activities undertaken by a Company shall not constitute CSR activities of the Company:

- activities undertaken in pursuance of normal course of business of the company;
- any activity undertaken by the company outside India except for training of Indian Sports personnel representing any state or union territory at national level or India at international level;
- contribution of any amount directly or indirectly to any political party under section 182 of the Act;
- activities benefitting the employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
- activities supported by the company on sponsorship basis for deriving marketing benefits for its products or services;
- activities carried out for fulfilment of any statutory obligations under any law in force in India.

MODE OF CARRYING OUT CSR ACTIVITIES

The Company may carry out the CSR activities either on its own, or through a trust or registered society or through NGO or through a company registered under Section 8 of the Companies Act, 2013 or through one or more of the modes in such manner as it deems fit. The Company may also collaborate with other companies for undertaking projects, programs and activities in such manner as it deems fit.

CSR COMMITTEE

The Board of Directors of the Company shall constitute a committee called the “Corporate Social Responsibility Committee” (“CSR Committee”) in accordance with the provisions of Companies Act, 2013 and rules made thereunder. The Corporate Social Responsibility Committee will consist of 3 or more directors out of which at least one director shall be an independent director. Provided that where a company is not required to appoint an independent director under sub-section (4) of Section 149, it shall have in its Corporate Social Responsibility Committee two or more Directors or such other number of directors as the Board of Directors of the Company may determine from time to time. The Board of Directors may change the composition of the CSR Committee from time to time in such manner as it thinks fit.

Subject to provisions of Companies Act, 2013 and rules made thereunder, the CSR Committee may meet at such intervals, in such manner and may carry out matters in such manner and function generally as per such guidelines as it deems fit.

The CSR Committee shall have, inter alia, the following roles, powers and responsibility:

- (i) Formulate and recommend the CSR Policy and any amendments therein to the Board of Directors of the Company;
- (ii) Develop and approve various CSR projects, programs and activities to be undertaken from time to time either directly by the Company or through other entities;
- (iii) Determine modalities of execution of such CSR projects, programs and activities;
- (iv) Undertake all necessary steps to implement the CSR activities;
- (v) Authorise and approve CSR expenditure from time to time subject to the limits approved by the Board of Directors;
- (vi) Monitor the CSR activities in such manner as it deems fit;
- (vii) Carry out all such acts, deeds, matters and things as may be required in connection with aforesaid matters and generally for any matter connected with the CSR policy of the Company;
- (viii) To perform such functions as may be entrusted by the Board of Directors from time to time.

CSR SPENDING

The Company may, in every financial year, spend such amounts on its CSR activities as the Corporate Social Responsibility Committee may authorise from time to time subject to the limits as approved by the Board of Directors.

Any surplus arising out of CSR projects, programs and activities shall not form part of the business profits of the Company.

MONITORING PROCESS

CSR Committee shall monitor the implementation of various programs, projects and activities in such manner as it deems fit. CSR Committee shall ensure that a transparent monitoring mechanism is put in place.

Without prejudice to the generality of the contents of this policy, the Company may undertake CSR projects, programs and activities as permitted under the framework of Companies Act, 2013 from time to time (including any amendments, clarifications, circulars, notifications or other official communications from time to time). The Company may also

carry out the purposes of this CSR policy in accordance with any amended position of law from time to time notwithstanding that such amended position is not reflected in this policy.

This Policy is duly approved by the Board on *14th July, 2022* and shall be effective from that day itself.

**For & on behalf of the Board of Directors
BNK Securities Private Limited**

**Sd/-
Sanjeev Kumar Khandelwal
Managing Director**