

CORPORATE SOCIAL RESPONSIBILITY POLICY

OBJECTIVE

The main objective of the CSR policy is to lay down guidelines for Alchemy Capital Management Private Limited (“Alchemy” or “Company”) to ensure that its CSR spend results in a positive contribution to the society.

CSR PROGRAM SCOPE

The following is the list of CSR projects or programs which Alchemy plans to undertake pursuant to Schedule VII of the Companies Act, 2013:

- eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
- promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and other livelihood enhancement projects;
- promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities.
- 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;
- training to promote rural sports, nationally recognized sports, Paralympics and Olympic sports;
- contribution to the 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 Scheduled Tribes, other backward classes, minorities and women;
- rural development projects;
- Any other measures with the approval of Board of Directors on the recommendation of CSR Committee subject to the provisions of Section 135 of Companies Act, 2013 and rules made there-under.

CSR COMMITTEE

• Committee Constitution

Pursuant to the provisions of Section 135 of the Companies Act, 2013 the Board of Directors shall constitute the CSR Committee. The Members of the CSR committee shall be appointed by the Board of Directors of the Company and must constitute at least 3 or more Directors.

The CSR committee is constituted consisting of :

- ❖ Mr. Lashit Sanghvi - Chairman
- ❖ Mr. Manu Parpia - Member
- ❖ Mr. Hiren Ved - Member

- ❖ Ms. Pooja Keswani - Member and Secretary of the Committee

- **Duties and Responsibilities**

Following are the Powers of the Committee:

- ❖ Formulate CSR Policy & recommend the same to the Board of Directors of the Company for approval.
- ❖ Disclose the contents of such policy on the website in the manner prescribed under the Companies Act, 2013.
- ❖ Recommend CSR activities to the Board as stated under Schedule VII of the Companies Act, 2013.
- ❖ Recommend the CSR budget.
- ❖ Review the various proposals and identify the eligible entities/agencies for allocation of CSR amount.
- ❖ Spend the allocated CSR amount on the CSR activities once it is approved by the Board of Directors of the Company in accordance with the Act and the CSR Rules.
- ❖ Monitor and review periodically the CSR activities and submit the reports to the Board in respect of the CSR activities undertaken by the Company.
- ❖ Monitor the CSR Policy from time to time.
- ❖ Authorize senior executives of the Company or the experts to attend the CSR Committee meeting and liaise with the identified entities/ agencies for the purpose of carrying out the CSR activities.
- ❖ Is authorized to approve any modification to the CSR Plan or to propose any new program during the financial year.

- **Frequency of the Meetings of the CSR Committee**

- ❖ The CSR committee shall meet at least once in 6 months.
- ❖ Members of the CSR committee can agree upon mutually regarding the time and place for the said meetings.
- ❖ Quorum of the meeting should be 2.
- ❖ Notice and the agenda of meeting may be given in advance to the members by any communication means.
- ❖ The members of the Committee may participate in the meeting either in person or through video conferencing or other audio visual in accordance with the provisions of the Companies Act, 2013 and rules made thereunder from time to time.
- ❖ The CSR committee may decide to add permanent invitees to the meetings.
- ❖ Other members of the Senior Management may attend the CSR Committee Meetings as maybe appropriate, subject to the approval of the CSR Committee.
- ❖ Each member shall be entitled to one vote and the decision shall be decided by the majority of votes. In case of an equality of votes, the Chairperson of the meeting has a casting vote.
- ❖ Minutes of the CSR Committee shall be placed before the Board for noting.

CSR BUDGET / CSR SPEND

- **Budget**

The CSR Budget would be at least as described under Rule 2(f) of the CSR Rules, 2014 and subsequent amendments effected from time to time, but should not be limited / restricted to this amount.

- **Spend**

The amount should be spent for CSR activities in India and in accordance with the Provisions of Section 135 of Companies Act, 2013.

- **Failure to spend the CSR money**

In case the Company fails to spend the above targeted amount in that particular financial year, the Committee shall submit a report in writing to the Board of Directors specifying the reasons for not spending the amount which in turn shall be reported by the Board of Directors in their Directors report for that particular Financial Year.

Surplus arising out of the CSR initiatives shall not form part of the business profits of the Company.

CSR INITIATIVES

In line with Schedule VII of the Companies Act, 2013 and the CSR Rules, 2014, the Company shall undertake CSR activities included in its annual CSR Plan, as recommended by the CSR Committee at the beginning of the year.

The CSR Committee is authorized to approve any modification to the existing Annual CSR Plan or to propose any new program during the financial year.