

**JM FINANCIAL ASSET RECONSTRUCTION
COMPANY LIMITED**

CORPORATE SOCIAL RESPONSIBILITY POLICY

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SECTION I – GENERAL

1. Introduction:

JM Financial Group (consisting of JM Financial Asset Reconstruction Company Limited and its group companies) has been committed to be a socially responsible community for giving and development activities for several decades and this is integral to the Group's philosophy and values.

The provisions of Section 135 of the Companies Act, 2013 (the “**Act**”) read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (the “**CSR Rules**”), as amended from time to time, requires the companies that are falling within the purview of the said Section to undertake Corporate Social Responsibility (“**CSR**”) activities and allocate a percentage of their profit before tax to be spent on such activities.

This Policy is formulated in terms of the applicable provisions of the Act read with CSR Rules. This Policy document is prepared to outline the approach towards CSR, the method for selection of the projects to be supported, manner of execution, modalities of CSR funds utilization and the methodology for monitoring and reporting of the projects and reporting by JM Financial Asset Reconstruction Company Limited (the “**Company**”).

2. Objective:

Over the years, CSR in India has evolved and so has it at the group level. The Company and its group companies believe in inclusive development for the community at large, manifested through its CSR. The CSR programs are designed aligning to the group's vision as given below –

- Create long-term impact through CSR projects with collective action, collaborations and creating equitable opportunities for underserved.
- Actively work towards community development with a focus on integrated rural transformation primarily in predominantly rural and difficult terrains of our country.

3. Project Identification:

The Company shall support projects that its CSR Committee considers deserving, based on the following broad factors:

- The project is covered within the suggested areas or activities as specified under Schedule VII to the Act or rules made thereunder or such other areas as identified by the CSR Committee as it may deem appropriate considering the need;
- is capable of creating long term impact on the community; and
- any other project as may be deemed appropriate by the CSR Committee.

“**Ongoing Project**” for the purpose of this Policy, shall mean a project which is a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding three (3) years excluding the financial year in which it was commenced, and shall include a project that was initially not approved as a multi-year project but whose

duration has been extended beyond one (1) year and approved by the Board of Directors of the Company based on reasonable justification.

4. Formulation of Annual Action Plan:

The CSR Committee shall recommend to the Board of Directors of the Company for its approval, an Annual Action Plan which, inter-alia shall, include the following:




- list of CSR projects or programmes to be undertaken in areas or subjects specified in Schedule VII to the Act;
- manner of execution of such projects or programmes;
- modalities for 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.





The Board of Directors of the Company may alter such plan at any time during any financial year, as per the recommendation of the CSR Committee, based on the reasonable justification.

SECTION II – IMPLEMENTATION

1. Thematic Areas of Implementation:

The Company shall undertake CSR projects broadly falling within the thematic areas as per Schedule VII of the Act given below, in turn contributing to the United Nations’ Sustainable Development Goals -

Sr. No.	Schedule VII to the Act	Aligned Sustainable Development Goals
i.	eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set up by the Central Government for the promotion of sanitation and making available safe drinking water;	
ii.	promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;	
iii.	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;	

<p>iv.</p>	<p>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;</p>	
<p>v.</p>	<p>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 arts and handicrafts;</p>	
<p>vi.</p>	<p>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;</p>	
<p>vii.</p>	<p>training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;</p>	
<p>viii.</p>	<p>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 Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;</p>	
<p>ix.</p>	<p>contributions to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and Contributions to public funded Universities; Indian Institute of Technology; National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology; Department of Science and Technology; Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and</p>	

other bodies, namely Defense Research and Development Organisation; Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research 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);

x. rural development projects;



slum area development;

xi. 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.



xii. disaster management, including relief, rehabilitation and reconstruction activities;

xiii. Any other activities allowed under Section 135 of the Act read with the CSR Rules, as amended from time to time.

2. Manner of Execution:

Over last three decades, JM Financial Group has been engaged in community development interventions through following two charitable trusts - JM Financial Foundation and Kampani Charitable Trust.

JM FINANCIAL FOUNDATION

JM Financial Foundation, established in the year 2001 began its activities with support to the victims of the massive earthquake that hit the Kutch region in the state of Gujarat. Its objectives cover a wide area of activities and causes. In last several years, JM Financial Foundation has supported various institutions and NGOs on a number of outreach programs in several fields ranging from education, health, support to poor, animal welfare to disaster relief. Details about the Foundation are given in Annexure - I.

KAMPANI CHARITABLE TRUST (KCT)

KCT was established in the year 1984 for advancement and propagation of education, medical help to the poor and any other objects which are charitable and of general public utility like maintenance of gardens, care, upkeep and food for animals and birds.

The Trust has been achieving the aforesaid objects by contributing directly to needy persons as well as supporting the activities undertaken by various institutions.

The Company shall, in terms of the applicable provisions of the Act and CSR Rules, spend the funds on the projects recommended by the CSR Committee and approved by the Board of Directors of the Company either directly or through other implementing agency(ies) duly and fulfilling the regulatory criteria like having a unique CSR Registration number and registered under Sections 12A and 80G of the Income Tax Act, 1961.

The Company can also engage domestic and/or international organizations for designing, monitoring and evaluation of the CSR projects or programmes as per this policy as well as for capacity building of personnel for CSR, in case the same is recommended by the CSR Committee of the Board.

3. Modalities of Implementation:

The CSR Committee shall review the proposals presented by the CSR team and the Management team for the projects to be supported, detailed plans of such projects, modalities of execution, implementation schedule, monitoring process and amount to be allocated to each project.

The CSR Committee will satisfy itself about the projects, their efficacy, implementation schedule, project timeline, budget etc., as well as ensuring that the projects fall within the areas/activities as mentioned in the Act/CSR Rules. Based on its deliberations, the CSR Committee will recommend to the Board of Directors, the projects and the amount to be allocated for the same.

The CSR Committee shall give its recommendation and approval in compliance with this Policy and in terms of the Act.

The Company may make contributions to the selected Projects either directly or through the implementing agency viz., JM Financial Foundation as recommended by the CSR Committee and approved by the Board of Directors.

The Company may also collaborate with other companies including JM Financial Group Companies for undertaking projects or the CSR activities, subject to fulfillment that the CSR Committee of the Company is in a position to report separately on such projects in accordance with the CSR Rules.

Further, the Company may, if approved by the Board/CSR Committee, implement the CSR activities through implementing partners/executing agencies which may include a company established under Section 8 of the Act, or a registered public trust or a registered society, any entity (i.e., statutory body) established under an Act of Parliament or a State legislature, exempted under sub-clauses (iv), (v), (vi) or (via) of clause (23C) of section 10 or registered under Sections 12A and approved under 80G of the Income Tax Act, 1961, and having an established track record of at least 3 (three) years in undertaking similar activities and registered as an implementing agency to carry out CSR activities.

The Company may also facilitate the voluntary involvement of its employees in CSR projects and development initiatives, offering an opportunity for them to contribute to meaningful causes, thereby facilitating their role as socially responsible citizens.

A certificate from the Chief Financial Officer certifying that the funds disbursed have been utilised for the purposes and in the manner as approved by the Board shall be placed before the Board of Directors.

4. **Reporting:**

The Company shall report its CSR mainly through the Director's Report. The annual CSR report shall, inter alia, include reporting on the following –

- *Governance* - Details of CSR Committee composition, number of meetings held and details of attendance along with the weblink(s);
- *Projects* - Details of ongoing projects and other than ongoing projects, amount spent, amount transferred to unspent CSR account and amount transferred to any fund specified under Schedule VII;
- *Monitoring* - Details of Impact Assessment (if conducted during the financial year as per the CSR Rules or voluntarily).

Annual CSR reporting shall be made in the format as prescribed under the CSR Rules.

The Company shall also display this Policy, CSR Committee composition and details of CSR projects approved by the Board of Directors on its website and update the same regularly.

5. **Monitoring and Evaluation:**

The CSR Projects shall be monitored in the following manner -

- The CSR Committee of the Board shall be responsible for monitoring the CSR Policy of

the Company from time to time.

- Periodic submission by CSR team, of CSR report giving status of the approved Projects, amounts allocated, expenditure incurred and such other details as may be required by the CSR Committee/Board of Directors of the Company.

In case of ongoing project, the Board of Directors of the Company shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation.

6. Impact assessment, if required:

If the CSR obligation of the Company is Rs. 10 crore or more as calculated on the basis of an average profits of the three (3) immediately preceding financial years, then, pursuant to the applicable provisions of the Act and CSR Rules made thereunder, the Company shall undertake impact assessment, through an independent agency, of its CSR projects having outlays of Rs. 1 crore or more, and which have been completed not less than one (1) year before undertaking the impact study. The impact assessment reports will be placed before the Board of Directors and shall also be annexed to the annual report on CSR of the Company. Similarly, the projects can as far as possible be based on needs assessment undertaken designing stage.

The expenditure incurred in undertaking impact assessment is allowed to be booked towards CSR for the financial year for which the impact assessment is done, and shall not exceed 2% of the total CSR expenditure for that financial year or Rs. 50 lakh, whichever is higher.

SECTION III – ANNUAL ALLOCATION

1. Outlay:

- The budgets allocated for CSR obligations shall be as per Section 135 of the Act, which is two (2) percent of the average net profits of last three (3) years.
- The spending should be aligned to the Annual Action Plan and in accordance with this Policy.
- If for reasons explained to and noted by the CSR Committee, the funds allocated for spending as per the Annual Action Plan remain unspent/overspent, the fact and reasons for the gap in spending/over spending will be included in the Board's report for the concerned financial year. The Company will also ensure that the applicable provisions of the Act and the CSR Rules are followed in respect of use/transfer to specified accounts of such unspent/overspent funds.
- The budget allocated towards administrative overheads shall not exceed five (5) percent of the total CSR expenditure of the Company for that concerned financial year.

“Administrative overheads” means the expenses incurred by the Company for ‘general management and administration’ of CSR functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular CSR project or programme.

2. Treatment of Surpluses:

The surplus arising out of the CSR projects or programs or activities shall not form part of the

business profits of the Company and shall be spent/transferred in the manner prescribed under the applicable provisions of the Act and the CSR Rules.

3. **Capital Assets created or acquired:**

The CSR amount may be spent by a Company for creation or acquisition of a capital asset. Such capital asset shall be held by -

- a company established under Section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number as prescribed under the CSR Rules; or
- beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
- a public authority.

SECTION IV – GOVERNANCE

The Company shall constitute CSR Committee of the Board consisting of three or more directors, out of which at least one director shall be an independent director.

An outgoing member of the CSR Committee may be replaced by any other member of the Board.

This Committee shall be responsible for all decision-making with respect to the Company's CSR Policy. The CSR Committee shall meet as often as its members deem necessary to perform the duties and responsibilities but not less than twice in a year. Due to any unforeseen events, if it's not feasible to hold at least two meetings, then at least one meeting shall be held during the year. The CSR Committee shall review the progress of various CSR projects in terms of both outcome assessment and financial monitoring.

The CSR Committee shall ensure efficient and effective implementation of the CSR projects through the implementing agencies or directly, as the case may be.

REVIEW / AMENDMENT TO THE POLICY

Any amendment in this Policy may be carried out based on the recommendation of CSR Committee and with the approval of the Board of Directors of the Company.

In case any amendments, clarifications, circulars and guidelines as issued by the regulatory body(ies)/authority(ies) and such amendments, clarifications, circulars and guidelines are not consistent with the requirements specified under this Policy, then the provisions of such amendments, clarifications, circulars and the guidelines shall prevail and accordingly this Policy shall stand amended effective from the date as laid down under such amendments, clarifications, circulars and guidelines.

ANNEXURE – I

JM FINANCIAL FOUNDATION

Introduction

At JM Financial Foundation, CSR has always been a priority, culminating into its community development programmes and initiatives. As a Foundation, its focus has always been long-term, inclusive growth in the thrust areas of education, health, livelihoods and women empowerment. The Foundation is committed to the most vulnerable, marginalized and unreached communities in the society.

JM Financial Foundation was founded on March 14, 2001 with the prime objective of providing relief to the victims of the then recent Gujarat earthquake. Over the years, the Foundation has taken up impactful, long-term social projects through the CSR funds of JM Financial Group of Companies.

Trustees

The trustees of JM Financial Foundation for the time being are:

- Mr. Nimesh Kampani
- Ms. Dipti Neelakantan
- Ms. Amishi Gambhir
- Mr. Prashant Choksi
- Mr. Manish Sheth
- Ms. Puja Dave

Objectives of the Foundation

The objectives of JM Financial Foundation, inter alia, is to provide assistance in suitable manner whether financial, medical, food, clothing, shelter, etc. to the needy, deserving and poor people who cannot afford the same, as well as to carry out other objects of public utility.

Activities/Projects

Since our founding, we have supported over 35 most deserving organizations and their causes by way of philanthropy and CSR. Over the years, the objectives of the Foundation have also expanded with a belief in serving the bottom of the pyramid in some of the most difficult regions of the country by way of CSR that enables long-term, grassroots, inclusive and integrated rural development.