

DHARAMSHI SECURITIES PVT. LTD.

CIN:U67120MH1995PTC087300

Quest, 1073, Rajabhau Desai Marg, Behind Beau Monde Tower, Prabhadevi,
Mumbai- 400 025 Tel : 6939 4444 E-mail : dharamshi@dharamshi.net

CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR POLICY)

OF

DHARAMSHI SECURITIES PRIVATE LIMITED

Dharamshi Securities Private Limited (hereinafter referred to as “the Company”) is engaged in the business of Broking & dealing in Shares, Securities & Derivatives. We follow the rationale that we are linked closely to the communities in which we operate. We cannot exist in isolation. All our actions are focused around this feeling of being centered.

OBJECTIVE:

The main objective of CSR policy is to make CSR a key business process for sustainable development of society. The Company will act as a good corporate citizen and aims at supplementing the role of Government in enhancing the welfare measures of the society within the framework of its policy.

MEASURES:

In the aforesaid backdrop, policy on CSR of the Company is broadly framed taking into account the following measures:

The Board of the Company may decide to undertake its CSR activities as recommended by the CSR Committee, through a registered trust/ NGO or registered society or collaborate with a Company having common CSR Policy, pursuant to Section 135 of the Companies Act, 2013 and rules made there-under.

The Company is committed to social wellbeing and focuses on the local area or areas around it where it operates, for spending the amount earmarked for CSR activities.

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

1. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and 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;

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3. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centre 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 quality of soil, air and water;
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;
7. Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
8. Contribution to any 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;
9. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
10. Rural development projects;
11. Slum area development; and
12. Disaster management, including relief, rehabilitation and reconstruction activities.

COMPOSITION OF CSR COMMITTEE:

Sr. No.	Name of Director	Designation
1	Mr. Hemang Raichand Dharamshi	Chairman
2	Mr. Tilesh Shantilal Meisheri	Member
3	Mr. Kalpraj Damji Dharamshi	Member
4	Mrs. Harsha Hemang Dharamshi	Member
5	Mrs. Hina Kalpraj Dharamshi	Member

POWERS AND FUNCTIONS OF CSR COMMITTEE:

The CSR Committee of the Company is vested with the following functions and powers:

- To formulate a CSR Policy and recommend to the Board for approval;
- To recommend CSR Activities to be undertaken by the Company as specified in Schedule VII of the Act and rules made thereunder;
- To recommend the amount of expenditure to be incurred on the CSR activities;
- To monitor and amend the Corporate Social Responsibility Policy of the Company from time to time as may be required;

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- To carry out any other function as mandated by the Board from time to time.

TOTAL OUTLAY:

The Company pledges to contribute at least 2% of the average net profits of the Company made during the 3 immediately preceding financial years specifically towards CSR initiatives whenever the compliance of the provisions of Section 135 becomes mandatory to the Company. For this purpose, the 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 surplus arising out of the CSR activities will not be considered as a part of the business profits of the Company and shall be ploughed back into the same project, or shall be transferred to the unspent CSR Account and it should be spent in pursuance of this CSR policy and annual action plan of the Company, or the Company may transfer such surplus amount to a Fund specified in Schedule VII of the Act, within a period of six months of the expiry of the financial year. Any unspent amount, other than unspent amount relating to an ongoing project, will be transferred to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year. Further, unspent CSR funds of ongoing projects will be transferred within a period of 30 days from the end of the financial year to a special account opened by the company in any scheduled bank called the “Unspent Corporate Social Responsibility Account”. Such amount shall be spent by the company towards CSR within a period of 3 financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of 30 days from the date of completion of the third financial year.

If the Company spends an amount in excess of the requirement or voluntarily spends amount on CSR activities in a particular year then such amount may be set off against the CSR spending requirement up to immediate succeeding three financial years subject to the conditions that the excess amount available for set off shall not include the surplus arising out of the CSR activities.

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.

ANNUAL CSR PLAN:

The Annual CSR Plan is a yearly plan of CSR activities that would be placed before the Board of Directors of the Company based on recommendation of its CSR Committee which outlines inter alia the following aspects of CSR initiatives of the Company:

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- Project Proposals
- Targeted Beneficiaries and their key needs
- Alignment with Schedule VII
- Project Goals and milestones
- CSR Budget with projections
- Monitoring mechanism
- Progress reporting and frequency of reports
- Risks and mitigation strategies
- Any other information as may be required by the CSR Committee

PROJECTS APPROVED:

The Company has been working in the area of promoting healthcare and accordingly it has donated money to Divya Drushti Charitable Trust (CSR Registration No. CSR00025147).

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