

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY
OF
CRP RISK MANAGEMENT LIMITED

(CIN: L72100MH2000PLC124689)

Registered Office: B - 208,209 Classique Centre, Off Mahakali Caves,
Andheri - (East), Mumbai – 400093

1. Preamble

The Company Seek to be a good corporate citizen in all aspects of its operations and activities. It is the Company's intent to make a positive difference to society. It recognize that it cannot do it all; so that if there are choice to be made, prioritization will be towards doing fewer projects with greater impact and focusing initiatives on communities in which the company lives and operates.

2. Vision and commitment

Our vision is to drive 'holistic empowerment' of the community through implementation of sustainable initiative which will have maximum societal impact by identifying the critical needs and gaps. We shall remain committed to the following operating principles –

- Conducting business in a socially responsible and ethical manner;
- Protecting the environment and the safety of people;
- Supporting human rights; and
- Engaging, learning from, respecting and supporting the local communities and cultures with which we work.

3. Objective

Company may carry out any one or more of the CSR activities, notified under the Section 135 of the Companies Act, 2013 ('The Act') and rules made there under and as amended from time to time.

4. Definitions

The term defined in this CSR Policy shall have the meanings herein specified and term not defined shall have the meanings as defined in the Companies Act, 2013 and Companies (Corporate Social Responsibility) Rules, 2014 including any statutory modifications or re-enactments thereof.

“Act” means the Companies Act, 2013 including any statutory modification or re-enactment thereof.

“Associate Company” in relation to another company, means a company in which that other company has a significant influence, but which is not a subsidiary company of the company having such influence and includes a joint venture Company.

Explanation: Significant influence means control of at least 20% of total share capital or of business decisions under an agreement.

“Average Net Profit” means profit calculated as per Section 198 of the Companies Act, 2013.

“Board” means the Board of Directors of the Company.

“Board’s Report” shall mean the report of the Board of Directors prepared in accordance with the Section 134(3) of the Companies Act, 2013.

“Company” means CRP RISK MANAGEMENT LIMITED

“CSR” means Corporate Social Responsibility.

“CSR activity” means the activities or project or programmes as recommended by the CSR Committee and approved by the Board, undertaken by the Company from time to time in any one or more of the areas falling under the Schedule VII of the Companies Act, 2013.

“CSR Committee” means the Committee of the Board constituted under Section 135 of the Act for the purpose of administration of CSR activities, supervising the adherence of this CSR Policy and the matter incidental thereto.

“CSR Policy” means the Corporate Social Responsibility policy as set out herein and as amended or modified from time to time.

“CSR Rules” means Companies (Corporate Social Responsibility) Rules, 2014.

“Independent Director” means a non-executive director of the Company within the meaning of Section 2(47) of the Companies Act, 2013 and clause 49(1)(a)(iii) of the Listing Agreement entered with the Stock Exchange(s).

“Holding Company” means a Company within the meaning of Section 2(46) of the Companies Act, 2013.

“Net Profit” means the Net profit of the company as per its financial statement prepared in accordance with the applicable provisions of the Act but shall not include the following namely –

- i. any profit arising from any overseas branch or branches of the Company, whether operated as a separate Company or otherwise; and
- ii. (ii) any dividend received from other Companies in India, which are covered under and complying with the provisions of section 135 of the Act.

“SEBI” means the Securities and Exchange Board of India constituted under Securities and Exchange Board of India Act, 1992.

“Subsidiary Company” means a Company within the meaning of section 2(87) of the Companies Act, 2013.

5. CSR Activities

- i. The Company shall undertake the activities as recommended by the CSR committee and approved by the Board in accordance with the provisions of Section 135 of the Companies Act, 2013 read with Schedule VII and Companies (CSR Policy) Rule, 2014.
 - a) Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water;
 - b) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
 - c) 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 for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
 - d) 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;
 - e) 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;
 - f) Measures for the benefit of armed forces veterans, war widows and their dependents;
 - g) Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
 - h) 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;
 - i) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
 - j) Rural development projects.

- ii. The CSR activities (either new or ongoing) shall be undertaken by the Company in accordance with this policy and shall exclude activities undertaken in pursuance of its normal course of business.
- iii. Subject to the provisions of section 135(5) of the Act, the CSR projects or programs or activities undertaken in India only shall qualify for CSR expenditure
- iv. The CSR programs or projects or activities that benefit only the employees of the Company and their families shall not be considered as CSR activities in accordance with the Act.
- v. Contribution of any amount directly or indirectly to any political party under section 182 of the Act shall not be considered as CSR activity.
- vi. Companies may build CSR capacities of their own personnel as well as those of their implementing agencies through Institutions with established track records of at least three financial years but such expenditure including expenditure on administrative overheads shall not exceed five percent of total CSR expenditure of the company in one financial year.

(Any surplus arising out of the CSR projects or activities shall not form part of the business profit of a company)

6. Role of the CSR Committee

1. Formulate and recommend to the Board, a Corporate Social Responsibility Policy in compliance with Section 135 of the Companies Act, 2013.
2. Identify the activities to be undertaken as per Schedule VII of the Companies Act, 2013.
3. Institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the Company.
4. Recommend the amount of CSR expenditure to be incurred on the earmarked CSR activities.
5. Monitor the implementation of the CSR Policy from time to time
6. Such other function as the Board may deem fit.

7. Role of the Board of Directors

1. After taking into account the recommendations made by the CSR Committee, approve the CSR Policy for the Company.
2. Ensure that the CSR activities included in this Corporate Social Responsibility Policy are undertaken by the Company.
3. The Board of the Company may decide to undertake its CSR activities approved by the CSR Committee, through a registered trust or a registered society or a Company established under section 8 of the Act by the company, either singly or along with its holding or subsidiary or associate company, or along with any other company or holding or subsidiary or associate company of such other company, or otherwise provided that – If such trust, society or

company is not established by the company, either singly or along with its holding or subsidiary or associate company, or along with any other company or holding or subsidiary or associate company of such other company, it shall have an established track record of three years in undertaking similar programs or projects/activities;

4. Ensure that in each financial year the Company spends at least 2% of the average net profits of the company made during the three immediate preceding financial years, calculated in accordance with Section 198 of the Act, in pursuance of its CSR policy. Further, while spending the amount earmarked for CSR activities, preference should be given to local areas and areas around the Company where it operates.
5. As per Section 135 of the Act, specify the reasons for under spending the CSR amount in the Board's Report.

8. CSR Monitoring and Reporting Framework

CSR Committee shall monitor periodically the implementation of the projects / programs / activities undertaken by the Company and report to the Board on a regular basis the progress of CSR activities.

9. CSR Expenditure

The CSR activities undertaken in India only shall amount to CSR Expenditure. CSR expenditure shall include all expenditure including contribution to corpus, for projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee, but does not include any expenditure on an item not in conformity or not in line with activities which fall within the purview of Schedule VII of the Act.

10. Disclosure of the Policy

The CSR policy recommended by the CSR Committee and approved by the Board shall be displayed on the Company's website and shall be disclosed in the Board's report as well.

11. CSR Reporting

The Board Report of a Company shall include an Annual Report on CSR containing particulars specified in Annexure to the CSR Rules as per the prescribed format.

12. Frequency of Meetings

The meetings of the Committee could be held at such periodic intervals as may be required.

13. Quorum of Meetings

Minimum two (2) members shall constitute a quorum for the Committee meeting

14. Chairman of Meetings

In the absence of the Chairman, the members of the Committee present at the meeting shall choose one amongst them to act as Chairman.

15. Secretary

The Company Secretary of the Company shall act as Secretary of the Committee.

16. Minutes of the Committee Meeting

Proceedings of all meetings must be minuted and signed by the Chairman of the Committee and tabled at the subsequent Board and Committee meeting.

17. Miscellaneous

This policy shall be updated from time to time, by the Company in accordance with the amendments, if any, to the Companies Act, 2013, rules made thereunder or any other applicable enactment for the time being in force.