

**CORPORATE SOCIAL
RESPONSIBILITY (CSR)
POLICY
OF
GRETEX SHARE BROKING LIMITED**
(Formerly Known as Gretex Share Broking Private Limited)

PHILOSOPHY OF CSR

The world is facing numerous challenges ranging from poverty, malnutrition, environmental degradation, poor healthcare and climate change, inter alia. The social responsibility policy focuses on using the capabilities of business to improve lives and contribute to sustainable living, through contributions to local communities and society at large.

OBJECTIVE

The objective of the company's CSR policy is to lay down guiding principles for proper functioning of CSR activities to attain sustainable development of the society around the area of operations of the Company.

CSR VISION

As a responsible corporate citizen, promote Sustainable and inclusive development.

DEFINITIONS

- (a) "Act" means the Companies Act, 2013 (18 of 2013);
- (b) "Administrative overheads" means the expenses incurred by the company for 'general management and administration' of Corporate Social Responsibility functions in the company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme;
- (c) "Corporate Social Responsibility (CSR)" means the activities undertaken by the Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the provisions contained in the Companies (Corporate Social Responsibility Policy) Rules, 2014 (as amended from time to time), but shall not include the following, namely:-
 - (i) activities undertaken in pursuance of normal course of business of the company;
 - (ii) 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;
 - (iii) contribution of any amount directly or indirectly to any political party under section 182 of the Act;
 - (iv) activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
 - (v) activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
 - (vi) activities carried out for fulfilment of any other statutory obligations under any law in force in India;
- (d) "CSR Committee" means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act;

- (e) "International Organisation" means an organisation notified by the Central Government as an international organisation under section 3 of the United Nations (Privileges and Immunities) Act, 1947 (46 of 1947), to which the provisions of the Schedule to the said Act apply;
- (f) "Net profit" means the net profit of the Company as per financial statements 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) any dividend received from other companies in India, which are covered under and complying with the provisions of section 135 of the Act;
- (g) "Ongoing Project" means a multi-year project undertaken by the Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board of Directors based on reasonable justification;
- (h) "Public Authority" means 'Public Authority' as defined in clause (h) of section 2 of the Right to Information Act, 2005 (22 of 2005);

Words and expressions used and not defined in this Policy but defined in the Act shall have the same meanings respectively assigned to them in the Act.

NEED FOR THE CSR POLICY

Ministry of Corporate Affairs, Government of India has notified Section 135 being provision relating to CSR with effect from 1st April, 2014 and also notified rules namely the Companies (Corporate Social Responsibility Policy) Rules, 2014 which came into effect from the said date.

Since the Company falls under the criteria provided under Section 135(1) of the Act, it is required to comply with the provisions relating to CSR. The Act requires the Company to spend at least 2% of the "average net profit" made during 3 immediately preceding financial year on CSR activities as per CSR Policy.

During the Financial Year 2022-23, the provisions of Section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility) Rules, 2014 became applicable to the Company.

CSR COMMITTEE:

Following directors shall be the Committee members of the CSR Committee:

Sr. No.	Name of the Director	Status	Nature of Directorship
1.	Mr. Alok Harlalka	Chairperson	Joint Managing Director
2.	Mr. Arvind Harlalka	Member	Managing Director
3.	Mr. Deepak Shah	Member	Whole Time Director
4.	Mr. Jiten Talakchand Shah	Member	Non-Executive Independent Director
5.	Mr. Vivek Joshi	Member	Non-Executive Independent Director

ROLE OF CSR COMMITTEE:

The CSR Committee constituted in pursuance of Section 135 of the Companies Act, 2013 shall be required to carry out the following activities:

- a) Formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII;
- b) Recommend the amount of expenditure to be incurred on the activities referred to in clause(a); and
- c) Monitor the Corporate Social Responsibility Policy of the company from time to time.

CSR ACTIVITIES:

The Policy recognizes that corporate social responsibility is not merely compliance; it is a commitment to support initiatives that measurably improve the lives of underprivileged by one or more of the following focus areas as notified under Section 135 of the Companies Act 2013 and Companies (Corporate Social Responsibility Policy) Rules 2014:

- i. Eradicating hunger, poverty & malnutrition, promoting preventive health care & sanitation & making available safe drinking water;
- ii. Promoting education, including special education & employment enhancing vocational skills especially among children, women, elderly & the differently able & livelihood enhancement projects;
- iii. Promoting gender equality, empowering women, setting up homes & hostels for women & orphans, setting up old age homes, day care centers & such other facilities for senior citizens & measures for reducing inequalities faced by socially & economically backward groups;
- iv. Reducing child mortality and improving maternal health by providing good hospital facilities and low cost medicines;
- v. Providing with hospital and dispensary facilities with more focus on clean and good sanitation so as to combat human immunodeficiency virus, acquired immune deficiency syndrome, malaria and other diseases;
- vi. Ensuring environmental sustainability, ecological balance, protection of flora & fauna, animal welfare, agro forestry, conservation of natural resources & maintaining quality of soil, air & water;
- vii. Employment enhancing vocational skills
- viii. Protection of national heritage, art & culture including restoration of buildings & sites of historical importance & works of art; setting up public libraries; promotion & development of traditional arts & handicrafts;
- ix. Measures for the benefit of armed forces veterans, war widows & their dependents;
- x. Training to promote rural sports, nationally recognized sports, sports & Olympic sports;

xi. Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development & relief & welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities & women;

xii. Contributions or funds provided to technology incubators located within academic institutions, which are approved by the Central Government;

xiii. Rural development projects, etc

xiv. Slum area development.

Explanation. – For the purposes of this item, 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.

The Above list is illustrative not exhaustive. All activities under the CSR activities should be environment friendly and socially acceptable to the local people and Society. Contribution towards C.M relief fund shall be a part of CSR activities above 2% of Net profit other than the activities mentioned above. Further Ministry of Corporate Affairs vide Notification dated 24.10.2014 increased the scope of contribution made towards Corporate Social Responsibility Activities namely:

(i) In item (i), after the words "and sanitation", the words "including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of

sanitation" shall be inserted;

(ii) In item (iv), after the words "and water", the words "including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga" shall be inserted.

SCOPE:

EDUCATION

- i) Support to Technical /Vocational Institutions for their self-development.
- ii) Academic education by way of financial assistance to Primary, Middle and HigherSecondary Schools.
- iii) Adult literacy amongst those belonging to BPL.
- iv) Awareness Programs on girl education.
- v) Counselling of parents
- vi) Special attention on education, training and rehabilitation of mentally & physicallychallenged children/persons.
- vii) Spreading legal awareness amongst people and disadvantageous sections of the society about their rights & remedies available.
- viii) Promotion of Professional Education by setting up educational Institutionsoffering courses in Engg , Nursing ,Management,
- ix) Medicine and in Technical subjects etc.
- x) Provide fees for a period of one year or more to the poor and meritorious, preferably girl students of the school in the operational area of the Company to enable them to get an interrupted education.

WATER SUPPLY INCLUDING DRINKING WATER:

- i) Installation/Repair of Hand Pumps/Tube Wells.
- ii) Digging/Renovation of Wells.
- iii) Gainful utilization of waste water from Under -ground Mines for Cultivation or anyother purpose.
- iv) Development/construction of Water Tank/Ponds.
- v) Rain water-harvesting scheme.
- vi) Formation of a Task Force of Volunteers to educate people regarding
- vii) Proper use of drinking water.
- viii) Empowerment to the villagers for maintenance of the above facilities for availability of water.

HEALTH CARE ORGANIZING, HEALTH AWARENESS CAMPSON

- i) AIDS TB and Leprosy
- ii) Social evils like alcohol, smoking, drug abuse etc.
- iii) Child and Mother care
- iv) Diet and Nutrition.
- v) Blood donation camps.
- vi) Diabetics detection & Hypertension Camps
- vii) Family Welfare.
- viii) Senior Citizen Health Care Wellness Clinics.
- ix) Fully equipped Mobile Medical Vans.
- x) Telemedicine
- xi) To supplement the different programme of Local/State Authorities.
- xii) Along with De addiction centers.

ENVIRONMENT:

- i) Organizing sensitizing Programmes on Environment Management and
- ii) Pollution Control.
- iii) Green belt Development
- iv) A forestation, Social Forestry, Check Dams, Park.
- v) Restoration of mined outlands.
- vi) Development of jobs related to agro product i.e., Dairy/Poultry/farming and others.
- vii) Plantation of saplings producing fruit.
- viii) Animal care.

SOCIAL EMPOWERMENT.

- i) Self /Gainful Employment Opportunities – Training of Rural Youth for Self Employment (TRYSEM) on Welding, Fabrication, and other Electronic appliances.
- ii) To provide assistance to villagers having small patch of land to develop mushroom farming, medicinal plants, farming & other cash crops to make them economically dependent on their available land resources.
- iii) Training may be provided by agricultural experts for above farming.
- iv) Organizing training programmes for women on tailoring Embroidery designs,
- v) Home Foods/Fast Foods, Pickles, Painting and Interior Decoration andother
- vi) Vocational Courses.

- vii) Care for senior citizens.
- viii) Adoption/construction of Hostels (especially those for SC/ST & girls)
- ix) Village Electricity/Solar Light
- x) To develop infrastructural facilities for providing electricity through Solar Lights or alternative renewal energy to the nearby villages. Recurring expenditure should be borne by the beneficiaries.
- xi) Pawan Chakki as alternative for providing electricity in villages, etc.

SPORTS AND CULTURE

- i) Promotion of Sports and Cultural Activities for participation in State and National level.
- ii) Promotion/Development of sports activities in nearby villages by conducting Tournaments like Football, Kabaddi and Khokho, Cricket etc.
- iii) Providing sports materials for Football, Volleyball, Hockey sticks etc. to the young and talented villagers.
- iv) Promotion of State level teams.
- v) Sponsorship of State Sports events.
- vi) Sponsorship of Cultural event to restore Indian Cultural Traditions and Values.
- vii) Possibility of providing facilities for physically handicapped persons may be explored.
- viii) Medias for preparing of documentary films.
- ix) Guide-lines to be followed to promote sports activities by way of granting financial assistance/donation/sponsorship etc.
- x) Registered Clubs/Institutions which promote Sports activities may be granted financial assistance/donations/sponsorship based on the following norms:-
 - 1) Sports talent development programme by Clubs/Institutions may be encouraged provided the proposal is routed through the respective Government Authorities/Block Development Office/Sub-Divisional Office/District Office/State Associations/ local people representatives i.e. Panchayat, Pradhan/Mukhiya/MLA/MP/ Minister etc., to ascertain bonafide objective, status of activities and contribution to the society.
 - 2) Helping State Government in promotion of sports by providing them proper training facilities, grounds, construction off fields, etc.
 - 3) While sanctioning financial assistance/donation/sponsorship for State/ National/International events, Company could send its representatives to ensure proper utilization of fund for the specific purpose, as well as, to ensure publicity/coverage for corporate image building.
 - 4) As per the Government policy for payment of financial assistance/donation/ sponsorship Registered Clubs/Institution will furnish details as required by Company. i.e. their Registration, PAN No. etc. to establish their authenticity.

- xi) Generate self-employment.
- xii) Infrastructure Support – construction, repair, extension etc.of:-
 - i. Auditorium,
 - ii. Educational Institutions
 - iii. Rural Dispensaries initiated by reputed NGOs.
 - iv. Mobile Crèches.
 - v. Bridges, Culverts & Roads,
 - vi. Check Dam
 - vii. Shopping Complex to facilitate business/self-Employment for local people
 - viii. Community Centre,
 - ix. Sulabh Souchalaya,
 - x. Yatri Shed in Bus Stand,
 - xi. Burning Ghat/Crematorium
 - xii. Development of Park
 - xiii. Play Ground/Sports complex / Good Coaches.
 - xiv. Old Age Home.

THE GEOGRAPHIC REACH

The Act provides that the Company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for Corporate Social Responsibility. The Company will thus give preference to conducting CSR activities in the State herein the Company has/will have its operations. However, the Committee may identify such areas other than stated above, as it may deem fit, and recommend it to the Board for undertaking CSR activities.

ADMINISTRATION OF CSR PROJECTS

The Corporation can meet its CSR obligations by fulfilling its activities on its own or through a third party, such as a society, trust, foundation or Section 8 company (i.e., a company with charitable purposes) that has an established record of at least five years in CSR-like activities. Companies may also collaborate and pool their resources, which could be especially useful for small and medium-sized enterprises. Managing Director will have the power to sanction any project for CSR up to a limit of 10 lakhs, above which Board's approval will be required to sanction the amount.

AMENDMENTS TO THE POLICY

The Board of Directors on its own and/or on the recommendation of CSR committee can amend its policy as and when required deemed fit. Any or all provisions of CSR Policy would be subjected to revision/amendment in accordance with the regulations on the subject as may be issued from relevant statutory authorities, from time to time.

Note:

This Policy is adopted in the Board meeting dated September 05, 2023