

Policy governing

Corporate Social Responsibility (CSR) Policy

of

MFA CAPITAL PRIVATE LIMITED

(CIN: U74140MH2011PTC215636)

Regd. Office: 301, Narain Chambers, Mahatma Gandhi Road, Vile
Parle - East Mumbai City MH 400057

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CORPORATE SOCIAL RESPONSIBILITY POLICY MFA CAPITAL PRIVATE LIMITED (the Company)

Background

In compliance with the requirements of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended, the Company is, inter alia, required to: (i) Constitute a Board Committee to formulate and recommend to the Board a Corporate Social Responsibility (CSR) Policy, recommend the amount of CSR expenditure and monitor the CSR activities of the Company from time to time. (ii) Ensure that the Company spends, in every financial year, at least two per cent of the average Net Profits before Tax (PBT) of the Company, made during the three immediately preceding financial years, in pursuance of its CSR Policy.

Philosophy

Through the CSR there is a formation of a dynamic relationship between a company on one hand and the society and environment on the other. CSR has been driven by a moral obligation and philanthropic spirit which resonates with the policy of the Company.

Focus areas & Objectives

The Company aims to fulfil the requirements laid down under the Companies Act, 2013 and act diligently to comply with all its Rules and Regulations on CSR.

While the company is committed to conduct business in a true, fair and ethical manner. The Company is committed to operate its business in an economically, socially and environmentally sustainable manner, It also believes that giving back to the society through CSR activities is its moral duty.

The Company towards society at large would be focusing on supporting the NGOs, Charitable Trusts working for the children and young people suffering from the intellectual disabilities.

It aims to take up programmes that benefit the communities in and around its work centres and over a period of time, results in enhancing the quality of life of the people in the area of its business operations.

Applicability

The Company's CSR Policy has been developed in conformity with the provisions of Section 135 of the Companies Act, 2013 (referred to as the Act in this Policy) and in accordance with the CSR Rules (hereby referred to as the Rules) notified by the Ministry of Corporate Affairs, Government of India. 2. This Policy shall apply to all CSR initiatives and activities taken up at the various locations in India, preferably in the vicinity where the Company carries out its business operations and for the benefits of different segments of the society, specifically the deprived and under-privileged.

CORPORATE SOCIAL RESPONSIBILITY COMMITTEE

Composition:

The Corporate Social Responsibility Committee ('CSR Committee') shall consist of at least two or more Directors and the Chief Executive Officer. The Committee may formulate a CSR Sub-Committee with such other Directors / Executives of the Company from time to time as it may deem necessary and expedient. The Company Secretary shall act as the Secretary to the Committee.

Role of CSR Committee:

- a) To 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 of the Companies Act, 2013 (as amended from time to time).
- b) Identify and recommend to the Board, from time to time, the activities/ projects in line with such CSR policy and seek its approval for expenditure thereon, from the Board of Directors of the Company.
- c) To recommend the amount of expenditure to be incurred on the activities in a financial year.
- d) to put transparent monitoring mechanism to review the implementation status of each activities/ project.
- e) To monitor the Corporate Social Responsibility Policy of the company from time to time and recommend to the Board, modifications to the CSR policy as and when required.
- f) Any other matter/thing as may be considered expedient by the Members of the Committee in furtherance of and to comply with the CSR Policy of the Company.

Meetings:

The Committee shall hold meeting as and when required, to discuss various issues on implementation of the CSR Policy of the Company. The members would thrive to hold at least one meeting in a financial year.

The Committee shall periodically review the implementation of the CSR Programmes and issue necessary direction from time to time to ensure orderly and efficient execution of the CSR programmes in accordance with this Policy. It would be the responsibility of the CSR Committee to periodically keep the Board apprised of the status of the implementation of CSR activities.

Responsibilities of the Board:

- Form a CSR Committee and disclose the composition of the CSR Committee.
- Approve the CSR Policy after taking into account the recommendations made by the CSR Committee.
- Place the CSR Policy on the Company's website.
- Ensure implementation of the activities under CSR

- Ensure expenditure of requisite amount on CSR every year as per law.

Other Rules:

- 1) In pursuance of CSR objectives, the Company may appoint eligible executive agencies or form Collaborative Partnerships with the Government Agencies, the village Panchayats, NGOs and other like minded stakeholders in execution of CSR activities or even may engage international organisation(s) for designing, monitoring and evaluation of the CSR projects or programmes as well as for capacity building of its personnel for CSR. 1
- 2) The Executive agency registered under CSR will be finalised post ensuring that its activities are in line with the CSR policy of the company.
- 3) Once the programmes & executive agency are finalised, the CSR activities would be assigned either under the MOU or agreement entered into between the company and the executive agency or as per mutually agreed terms.
- 4) The Board of Directors of the Company shall monitor the CSR Programmes / Projects in such manner and on such periodicity as may be required by the Act / the Rules.
- 5) The Company must ensure appropriate documentation of the CSR Policy, annual CSR activities, executing partners, and expenditure entailed will be undertaken on a regular basis and the same will be available in the public domain.
- 6) CSR initiatives of the Company will also be reported in the Annual Report of the Company.