



menon and menon limited



Corporate Social Responsibility Policy

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1. CSR Policy:

We recognize that as a Corporate Entity, we have to adopt a balanced strategy benefiting the business we are in and the society in which we operate.

We understand our accountability and consequently care in a responsible manner for the social issues which are relevant in the environment and geographical location where we operate

We fully commit to contribute our part for enhancing social, economic, & environmental issues which are relevant at different points of time through the following:

- Effective deployment of the affordable resources we can make available
- Enlisting the support of Strategic partners who are experienced in the class of service we choose to offer
- Use of technology for the efficient use of resources

Through effective communication, we will ensure that all our stakeholders support our non-negotiable commitment to society in a manner which is sustainable and scalable commensurate to our business success

2. Definitions:

Board of Director: Board of Director or Board means the Board of Directors of the Company, as constituted from time to time.

“Company” means a company incorporated under the Companies Act, 2013 or under any previous company law.

“CSR Programmes” means Programmes, projects and activities carried out in this regard are the subject matter of this Policy.

“Corporate Social Responsibility Committee or Committee” means CSR Committee constituted by the Board of Directors of the Company, from time to time.

“Independent Director” means a Director of the Company, not being a whole time director and who is neither a promoter nor belongs to the promoter group of the Company and who satisfies other criteria for independence under the Companies Act, 2013.

“Policy” means Corporate Social Responsibility.

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013 or any other applicable regulation.

3. CSR Projects/Activities:

- a. To direct Company's CSR Programmes, inter alia, towards achieving one or more of the following - enhancing environmental and natural capital; supporting rural development; promoting education including skill development; providing preventive healthcare, providing sanitation and drinking water; creating livelihoods for people, especially those from disadvantaged sections of society, in rural and urban India and preserving and promoting sports.;
- b. To develop the required capability and self-reliance of beneficiaries at the grass roots, in the belief that these are prerequisites for social and economic development;
- c. To engage in affirmative action/interventions such as skill building and vocational training, to enhance employability and generate livelihoods for persons including from disadvantaged sections of society;
- d. To pursue CSR Programmes primarily in areas that fall within the economic vicinity of the Company's operations to enable close supervision and ensure maximum development impact;
- e. To carry out CSR Programmes in relevant local areas to fulfill commitments arising from requests by government/regulatory authorities and to earmark amounts of monies and to spend such monies through such administrative bodies of the government and/or directly by way of developmental works in the local areas around which the Company operates;

- f. To carry out activities at the time of natural calamity or engage in Disaster Management system;
- g. To contribute 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 Caste, the Scheduled Tribes, other backward classes, minorities and women;
- h. (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and
(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organization (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) 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).
- i. To rural development projects;
- j. To contribute to any fund setup by the Central Government or State Government(s) including Chief Minister's Relief Fund, which may be recognized as CSR activity;
- k. All other activities except stated above as per Schedule VI of the Section 135 of the Companies Act, 2013.

4. Implementation, Monitoring & Review

The company has constituted a CSR committee to oversee the implementation of this policy and formulate a CSR strategy

The CSR activities shall be implemented and monitored by an executive team or through external implementing agencies (and other Registered Trusts / Society or a Section 8 company that are established or that may be established by the Company).

In such cases, the Company will specify the CSR Programmes which may be undertaken by those Trusts/Societies or Section 8 companies in accordance with their objects and administrative and accounting processes laid down in the respective Trust Deeds/ Memorandum and Articles of Association

The CSR committee comprises of executive and nonexecutive independent directors to approve and monitor the CSR activities. It shall prepare the budget which will be reviewed and approved by the Board of Directors of the company.

The CSR committee will, in a fair and transparent manner, cause a report prepared on the community initiative work on a regular periodic basis for the Board

5. Governance

Every year, the CSR Committee will place for the Board's approval, a CSR Plan delineating the CSR Programmes to be carried out during the financial year and the specified budgets thereof. The Board will consider and approve the CSR Plan with any modification that may be deemed necessary.

The CSR Committee will assign the task of implementation of the CSR Plan within specified budgets and timeframes to such persons or bodies as it may deem fit.

The persons/bodies to which the implementation is assigned will carry out such CSR Programmes as determined by the CSR Committee within the specified budgets and timeframes and report back to the CSR Committee on the progress thereon at such frequency as the CSR Committee may direct.

The CSR Committee shall review the implementation of the CSR Programmes periodically and issue necessary directions from time to time to ensure orderly and efficient execution of the CSR Programmes in accordance with this Policy.

The CSR Committee will review periodically and keep the Board apprised of the status of the progress of implementation of the approved CSR Programmes.

Finally, at the end of every financial year, the CSR Committee will submit its report to the Board.

6. CSR Expenditure

CSR expenditure will include all expenditure as may be permitted under the applicable laws, including contribution to corpus for CSR Programmes 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.

7. Reporting

The Board's Report of the Company to include an annual report on CSR containing particulars specified in the annexure to the rule pertaining to a financial year commencing from April 1, 2014.

8. Disclosures

The contents of the approved CSR Policy shall be disclosed in the Board's Report and displayed on the Company's website.