

CORPORATE SOCIAL RESPONSIBILITY POLICY

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ACCESS FINANCIAL SERVICES LIMITED

1. PREAMBLE

- This policy shall apply to all CSR initiatives and activities taken up by the Company, for the benefit of the society- a key stakeholder of the company.
- This policy and the operational guidelines issued herein are subject to and pursuant to the provisions of the Companies Act, 2013 (“The Act”) and the rules and regulations made thereunder.

The Company’s Objective

The Company believes in Principles of “*Serving Society through Industry*”. It aims to achieve, consolidate and strengthen good corporate including socially and environmentally responsible business practices that balance financial profit with social well-being.

Implementation of CSR Initiatives

The Board of a 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 or alongwith any other company or holding or subsidiary or associate company of such other company, or otherwise:

Provided that---

(i) if such trust, society or company is not established by the Company or alongwith 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 program activities;

(ii) the company has specified the project or programs to be undertaken through these entities, the modalities of utilization of funds on such projects and programs and the monitoring and reporting mechanism.

The Company may also collaborate with other companies for undertaking projects or programs or CSR activities in such a manner as mentioned in CSR rules.

2. FOCUS AREAS

The Board of Directors upon the recommendation of the Corporate Social Responsibility Committee have identified the following listed in Schedule VII of the Companies Act, 2013 for carrying out its CSR activities:

- a) Eradicating hunger, poverty, and malnutrition, promoting healthcare, including preventive healthcare and sanitation, including contribution to the Swachh Bharat Kosh setup by the Central Government for the promotion of sanitation and making available safe drinking water.
- b) Company can undertake programme for Promoting education , including special education and employment enhancing vocation skills especially among children , women , elderly, and differently abled and livelihood enhancement project;
- 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; including contribution to the Clean Ganga Fund set-up by the Central Government for the rejuvenation of river Ganga.
- e) Protection of national heritage, art and culture including restoration of building 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 recognized sports , paralympic sports and Olympic sports ;
- h) Contribution of 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 Schedule Castes, the scheduled tribes , other backward classes, minorities and women;
- i) Contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government ;
- j) Rural development projects and Slum area development.
- k) Any other measure with the approval of Board of Directors on the recommendation of CSR committee subject to the provisions of section 135 of the Companies Act, 2013 and Rules made there-under.

3. CSR COMMITTEE

The Board of Directors of the Company will constitute a CSR Committee.
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Committee shall:-

- _ comprise at least three directors (the company being an unlisted public company, is not required to have an independent director);
- _ recommend and adopt CSR policy of the Company and monitor its implementation and the programmes there under;
- _ meet at such intervals as may be required or expedient including once at the end of the financial year;
- _ approve and adopt the CSR report for publication in the annual report of the company;
- _ do such other things and acts as may be required for the implementation of the policy, matters connected therewith or incidental thereto;

4. RESOURCES AND EXPENDITURE

A specific budget is allocated for CSR activities and spending on CSR activities shall not be less than 2% of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of this policy.

The Board shall approve overall limits for CSR Activities to be undertaken by the Company. Within the overall limits approved by the Board, the CSR Committee shall approve individual projects / programs. Any surplus arising out of the CSR projects, programs or activities will not form part of the business profit of the Company.

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 the CSR committee, but shall 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 Companies Act, 2013.

In case Company fails to spend such amount, the Board shall specify the reasons for not spending the amount.

Tax treatment of CSR spent will be in accordance with the Income Tax Act as may be notified by CBDT.

5. LOCATION

All CSR projects / programs under this policy shall give preference to the local area and area around it where it operates, for spending the amount earmarked for Corporate Social Responsibility activities. The CSR Committee shall decide on locations for implementation of the CSR projects / programs.

6. MONITORING & DISCLOSURE

The CSR Committee shall endeavour to:

- Devise a robust monitoring mechanism to ensure that the CSR projects / programs are undertaken effectively in accordance with the approval granted and are fully in compliance with applicable laws, rules and regulations. Monitoring of CSR activities could be done through:
 - Periodic third party assessment of key projects
 - Impact assessment with key indicators in our areas of operations
 - Regular review by CSR committee
 - Ensure that appropriate disclosures are made to the shareholders in the company's annual reports.

The CSR policy of the company would be disclosed in the Board's Report and also on the company's website.

7. INFORMATION DISSEMINATION

The Company's engagement in this domain is disseminated on its website, annual reports and its house journals as and when deem fit.

8. UPDATE

The policy is effective from Apr 1, 2014 (as updated) and CSR Committee of Board of ACCESS FINANCIAL SERVICES LIMITED will review the policy from time to time based on the changing needs and aspirations of the target beneficiaries and make suitable modifications as may be necessary.

9. COMPLIANCE WITH COMPANIES ACT, 2013

Our Corporate Social Responsibility policy conforms to the Section 135 of the Companies Act, 2013 on Corporate Social Responsibility as spelt out by the Ministry of Corporate Affairs, Government of India.

Provided that if the Company ceases to be a company covered under section 135(1) of The Act for three consecutive financial years, it shall not be required to:

1. Constitute a CSR Committee;, and
2. Comply with the provisions contained in Section 135(2)-(5) of The Act till such time it meets the specified criteria in S. 135(1).

10. CONTACT

For any query/clarification related to CSR policy of the company, please contact:

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