



CSR POLICY



Corporate Social Responsibility Policy (CSR)

Vestige Marketing Private Limited



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A. INTRODUCTION

VESTIGE MARKETING PRIVATE LIMITED ('Vestige' or 'the Company') has been an early adapter of Corporate Social Responsibility ('CSR') initiatives. Along with the sustained economic performance, environmental and Social Stewardship is also a key factor for our holistic business growth. We established **Vestige Heart to Heart Foundation** in 2012 as a not-for-profit body which aims at providing a dedicated approach to community development and upliftment of the underprivileged population through various initiatives. Vestige diverse projects and operations touch lives of people in many ways and create value by helping in overall and holistic development of communities across multiple geographies. Through its various initiatives, the group endeavors to play a relevant role by serving communities and projects that address gaps in basic societal requirements. Vestige Foundation also partners with non-governmental organizations (NGO'S) to improve the social status of the community. The company's focus has always been towards sustainability and improving & maintaining the health status of the community.

B. OBJECTIVE

Vestige's CSR Policy objectives are:

- To lay guidelines to make CSR a key priority
- To make a meaningful and measurable impact in the lives of economically, physically and socially challenged communities through various initiatives in Quality Healthcare & Quality Education

C. CSR FOCUS AREAS

According to Companies Act 2013, Section 135 Schedule VII following activities is covered under CSR:

- Eradicating hunger, poverty and malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water;
- Promoting education, including special education and employment enhancing vocation skills especially among children, women , elderly, and the differently abled and livelihood enhancement projects;
- Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up of 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;



- 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;
- Protection of natural 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;
- Measures for the benefit of armed forces, veterans, war widows and their dependents;
- Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- 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;
- Contribution of funds provided to technology incubators located within institutions which are approved by the Central Government
- Rural development projects.

D. CSR EXPENDITURE

- The CSR Committee will spend at least 2% of the average net profit during the preceding 3 financial years on CSR activities as mentioned in Section 135 of Companies Act 2013, Corporate Social Responsibility (CSR) 2014.
- Any surplus arising out of CSR activities shall not form part of business profit of the company and will be re-invested into CSR initiatives, and this will be over and above the 2% figure.

E. EXCLUSION FROM CSR

Following are the activities which are not considered as CSR activities and have been excluded:

- Training to enforcement personnel. (It is establishment functions of Government)
- Capacity building of Government officials and elected representatives- both in the area of PPPs and urban infrastructure.
- Sustainable urban development and urban public transport systems
- US-India Physicians Exchange Program- broadly speaking, this would be program that provides for the professional exchange of physicians between India and the United States.
- Activities outside India
- Contribution to political party.
- Employee Welfare
- Activities undertaken by the company in pursuance of its normal course of business
- Cosmetic philanthropy – One off Events as sponsoring TV Programs, Marathons etc.

F. EXECUTION OF CSR

- All the CSR activities/programs will be implemented by Vestige Heart to Heart Foundation, CSR arm/wing of Vestige Marketing Private Limited (Company).
- In collaboration with other companies undertaking projects/programs in CSR activities. The CSR committee of the respective companies should be in a position to evaluate and report the progress of such projects/programs.
- Any other institutes, NGO's, Government bodies, Trusts, etc. that have a record of at-least 3 years in similar such related activities.

G. LOCATION OF CSR ACTIVITIES

The CSR committee will decide the locations of all the projects.

H. COMPOSITION OF CSR COMMITTEE

The CSR Committee consists of the following directors:

CSR Chairman- Mr. Gautam Bali

Director- Mr. Kanwar Bir Singh

Director- Mr. Yuvraj Bali

The Board of Directors will appoint the CSR Committee members who include 2 directors and 1 CSR Chairman Committee.

I. RESPONSIBILITIES OF CSR COMMITTEE

- Formulating and recommending CSR policy to the board of directors and indicating the activities to be undertaken
- Recommending the amount of expenditure for the CSR activities
- Monitoring the CSR policy and activities from time to time

J. ROLE OF THE BOARD

- Formulation of CSR committee
- Approving the CSR policy
- Ensuring the implementation of the activities under CSR
- Ensuring that the committee spends at least 2% on the activities.
- Disclosing the reasons for not spending the prescribed amount (If applicable).

K. MONITORING & REPORTING

• **MONITORING**

The CSR committee will be responsible for the continuous monitoring of the CSR activities and report to the Board from time to time. A presentation of the CSR activities/projects will be made to the committee by the CSR executives at the committee meetings from time to time. The committee members will also receive quarterly reports which include the progress of CSR activities/projects. An annual presentation will also be made to the CSR committee includes the details of every project and also the activities along with their respective budgets which are being planned for the next financial year. The Board will review the implementation of CSR activities/projects from time to time (after every 6 months).

The CSR executive will be responsible for the monitoring of all the activities/projects. That person will receive the data from the field team every week and then collate the data and the facts into a report and then present it to the CSR committee from time to time. The executive will be responsible and take care of the field team and the work conducted by them.

Regular visits will be made from the HO to the field/ location of the projects.

• **REPORTING**

The Board level committee, based on reports presented by the CSR committee will annually publish report on CSR projects as a part of Directors report. The report will disclose the information in the format as prescribed by the Section 135 of the Companies Act 2013.



L. CSR ACTIVITIES

Following are the CSR activities conducted:

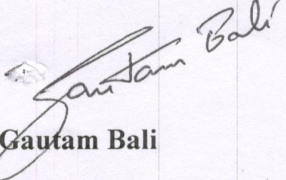
- **Aarogya Rath (Mobile Health Unit)** - The project aims at improving the health status of the underprivileged population of rural areas by providing free healthcare services and medicines. Currently the project is covering Rajakhera block, Dholpur district, Rajasthan. The project is conducted in phases.
- **Quality Education- Lakshya (Skill Development Project)** - The project aims at improving the livelihood by training them in healthcare sector and placing them in reputed firms. The project is conducted in phases. Co- Branding partner- ACC Trust.
- **Miracle Foundation-** The foundation in partnership with Miracle foundation has adopted children homes which provides shelter, meets the basic needs like food, education and health to more than 200 destitute children.

M. EFFECTIVE DATE:

This policy is effective from 1st April, 2018.

N. CONTACT:

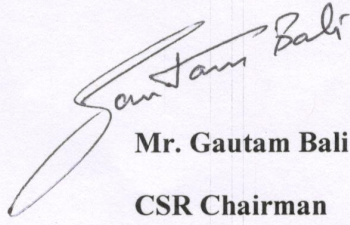
For further information write to us at: heart2heart@myvestige.com



Mr. Gautam Bali

Managing Director (MD)

Vestige Marketing Private Limited



Mr. Gautam Bali

CSR Chairman

Vestige Heart to Heart Foundation