



Corporate Social Responsibility
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Prepared by	Yamini Bansal (Dy. Manager – Accounts & Finance)	
Reviewed by	Raj Kumar Anand (Sr. Manager – Accounts & Finance)	
Concurred by	Sanjeev Goel (Managing Director)	
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Corporate Social Responsibility Policy

1. Preamble

For us in Intec Capital Ltd., reaching out to underserved communities especially to children is part of our DNA. The company has always endeavored to conduct its business responsibly, mindful of its social accountability, respecting applicable laws and with regard for human dignity. We believe in the trusteeship concept. This entails transcending business interests and grappling with the "quality of life" challenges that underserved children face, and working towards making a meaningful difference to them.

Intec Capital aims at conducting its business in a way that is sustainable, facilitating greater and more inclusive prosperity for current and future generations.

2. CSR Vision Statement

Intec's vision is to help children achieve their ambitions – in the right way by playing a broader role in the communities in which we live and work beyond what we deliver through core business activities. We do this through community investment programmes and the direct efforts of our colleagues. By aligning our community investment strategy to our skills and experience as an NBFC, the positive impact of our activity is much more than just a financial contribution

Our Purpose is – "to actively contribute to the social and economic development of the communities in which we operate. In so doing build a better, sustainable way of life for the poor and disadvantaged children and raise the country's human development index.

3. Title, Applicability and Validity of the CSR Policy

Intec Capital ('Company') has developed this Policy titled 'Intec's CSR Policy' (Policy) encompassing the Company's philosophy for being a responsible corporate citizen and lays down the principles and mechanisms for undertaking various programmes in accordance with section 135 of the Companies Act, 2013 ('the Act') for the community at large .

The company shall allocate at least 2% of its average net profits before taxes of the preceding three years, towards CSR activities to sustain and improve a healthy and prosperous environment and to improve the quality of life of the communities it serves.

The Policy shall guide the CSR programmes and activities undertaken by the Company in the communities in which it operates.

The Board shall review the CSR policy once a year or more and may amend as may be required.

4. CSR Program Areas , Objectives and Framework

The Company is committed to play a broader role in the communities in which it operates by way of supporting various initiatives through funding, fund raising and/or volunteering activities.

In order to achieve its goal, the company will undertake and support the under privileged children in following manner:

- Providing elementary education
- Providing vocational knowledge
- Providing Financial literacy and Mathematical enhancement
- Eradication of poverty and providing basic amenities of Food, shelter and health to such children

In addition to this, the Company will also undertake intervention in the areas of disaster relief, environment, rural and urban infrastructure and building social capital infrastructure.

The aforesaid thrust area is in line with the schedule VII of the Companies Act, 2013

CSR Approach: The Company's CSR will revolve around six guiding principles – Impact, Partnerships, Affirmative Action, Volunteerism, Communication and Innovation.

Delivery Mechanism: Whilst a large part of the CSR efforts of Intec, will be implemented by an in-house CSR team, the company will also partner with credible organizations – individually or as a consortium – to design, fund, implement and review projects. Partner agencies will be selected based on well-defined selection criteria.

5. CSR STRATEGY GRID – Goals, Program Areas and implementation

Domain/Goals and	Meaningful in Indian and context	Sustainable	Scalable	Participative	Business Integration (relevant to our Business)	Method of implementing CSR
Elementary education	Elementary education program for under privileged children	Sustained motivation and value for all the stakeholders Example- Mid Day Meal/ Government Aid (Books/Uniform/Transport etc)	Expandable to other geographies Integration with Health and Sanitation Platform	Opportunities for employees to actively contribute PPP model (Public Private Partnership) Participation of the targeted audience	Demonstrate senior management leadership in the community, through the Managing Director holding at least one board-level membership with a major local community	➤ The Company will enter into partnerships with the government, charity partners, civil society, social enterprises and communities to create multiplier effect of its social projects.
Vocational skills for underprivileged children	Also for children above 10 years, a vocational skill program.	Educational Programs having highest chance of economic value for a family Example- vocational training along with	Expandable through NGO's/ CSR Partners Opportunities for employee participation	Opportunities for employees to actively contribute		➤ The mode of implementation of CSR programmes will include a combination of direct implementation and



		an Educational Program			non-profit organization	implementation through own foundation, charity partners, registered societies, section 8 company etc. The Company will select its partners after appropriate due diligence.
Financial Literacy and mathematics enhancement Program	Developing Financial capability and literacy of children across the economic chain through Schools/ Partners	Sustained motivation and involvement of our employees to contribute in school programs	Expandable to all geographies where Intec is operational	<ul style="list-style-type: none"> • Opportunities for employees to actively contribute • School outreach program 	Highly meaningful wrt. our Business. Connecting functional expertise and management systems to enhance the financial literacy of children	<ul style="list-style-type: none"> ➤ The time period/duration over which a particular programme will be spread, will depend on its nature, extent of coverage and the intended impact of the program. ➤ Companies may collaborate or pool resources with other companies to undertake CSR activities and any expenditure incurred on such collaborative efforts would qualify for computing the CSR spending.
Eradication of poverty and providing basic amenities of Food, shelter and health to such children	India is a country of unexpected climatic and environmental disasters. In the event of such disasters, the Intec Capital Limited shall contribute in projects, funds and institutions eligible for CSR projects and Expenditure.					
Disaster relief, environment, rural and urban infrastructure and building social capital infrastructure	The contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Governments for socio-economic development and relief and funds and other institutions eligible for CSR Projects for the welfare of society at large.					<ul style="list-style-type: none"> ➤ The Company will use services of expert agencies, consultancy firms etc. wherever required for carrying out base line surveys, guidance on project design and implementation, impact assessment surveys etc.

6. CSR programs and its levels

Intec will identify and partner with NGO's to reach out to Street and working children, poor, underprivileged, special children. The Program will operate at following levels such as:

6A. Elementary Education

Elementary Education Program for school dropout or small children who never attended school. Intec will tie up with credible partner/ NGO to identify areas and projects wherein in formal elementary education is imparted to

children who do not have an opportunity to attend formal education. Once a basic level of informal education is attained, through PPP model under Sarva Shikha Abhiyan, qualified children should get admission in Government Schools.

6B. Vocational skills training and education for under privileged, street and working children

Lack of focus on skills required for the current job market and a poor enabling environment with deep systemic challenges. If these factors are not addressed, India's youth will continue to suffer from skills deficit, hindering not only their ability to gain employment and move out of poverty but further constraining national growth. *The children above ten years of age along with informal education, a vocational skills training related projects will be planned.*

6C. Financial literacy and Mathematics Enhancement Programme ('MEP') for Children above Poverty:

Intec will work with experienced and respected charities to reach children in schools and bring in elements of financial literacy. We do this through making concepts in math such as compound interest, profits and loss, risk analysis, nature of money and so on, interesting and inspiring. This is an area where we know we can make the biggest social impact for the communities we serve and we aim to make a long term positive difference to society.

Developing financial capability not only shapes children spending habits but can also enhance their life chances, prepare them for independent living and encourage vital social skills. The innovative financial literacy and Math Enhancement programme will enable student to approach mathematics in a creative way and go beyond the typical curriculum followed in schools.

6D. Eradication of poverty and providing basic amenities of Food, shelter and health to such children:

Intec will work with experienced and respected charities to reach under privileged children in schools, slums and from other weaker sections of community and will help in providing them with the basic amenities. This can be achieved in following manner:

- a) Setting up and running mid-day meal kitchens
- b) Running mobile medical vans and ambulances
- c) Reducing infant and maternal mortality
- d) Preventing and treating communicable diseases like malaria, tuberculosis and HIV / AIDS
- e) Promoting awareness about various health issues and generating demand for health services
- f) Distribution of clothes and other useful items to the needy children

7. CSR Budget and CSR Expenditure

- a) The Board shall endeavor that the Company spends at least 2% of the average net profit made during the immediate three preceding financial years.
- b) The CSR Corpus would include the following:
 - 2% of the average net profits,
 - any income arising therefrom
 - Surplus arising out of CSR activities.



- c) CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Programmes undertaken in accordance with the approved CSR Plan.
- d) The surplus arising out of CSR activities, projects or programs shall not form part of business profit of the Company.
- e) Moreover, any surplus arising from any CSR Programmes shall be used for CSR activities, projects or programs. Accordingly, any income arising from CSR Programmes will be netted off from the CSR expenditure and such net amount will be reported as CSR expenditure.

8. CSR Implementation process

- a) CSR programme will be undertaken by the Company within the defined ambit of Base Line Survey and Need Assessment.
- b) The mode of implementation will also include employee volunteering. The Intec Capital employees volunteering will involve the company's employees in the community initiatives it undertakes and help them contribute towards the society.

9. Geography

Preferably in Delhi and Delhi NCR.

10. The Funding, selection and monitoring mechanism

- Post receiving the proposals from various Trusts', NGO's.
- The Intec CSR Committee will examine deliberate on the proposals and approve proposals as per discretion.
- The CSR Team will collaborate with stakeholders and monitor the status of each project and submit its report to CSR Committee.

11. Project Monitoring:

- The Company will institute a well-defined monitoring and evaluation mechanism to ensure that each CSR programme has
- clear objectives developed out of the societal needs that are determined through baselines studies and research
- clear targets, time lines and measureable parameters wherever possible
- a progress monitoring and reporting framework that is aligned with the requirements of the section 135 of the Act and the CSR Rules



12. Roles and Responsibilities of the Board

- The Board of Directors of the Company will be responsible for:
- Approval of the CSR Policy of the Company
- disclosing the content of the Policy in its report and placing the Policy on the Company's website in such manner as prescribed under Section 135 of the Act read with the Companies (Corporate Social Responsibility Policy) Rules, 2014. ('CSR Rules')
- ensuring that the projects included in the Policy are undertaken by the Company
- ensuring that the Company endeavors to spend, in every financial year, at least 2% of the average net profits of the Company made during the three immediately preceding financial years in pursuance of the Policy
- ensuring that the Company gives preference to the local areas around its operations for spending the amount earmarked for CSR projects
- ensuring that it specifies the reasons in its report for not spending the allocated amount in case the Company fails to spend such amount

13. CSR Committee Members and its roles and responsibilities

The CSR Committee shall consist of maximum three directors and minimum two directors as constituted and reconstituted from time to time by the Board of Directors of the Company. The two directors shall form the quorum.

The Board shall have the power to make any change(s) in the constitution of the Committee and terms of reference of committee and their role and responsibility.

The role and responsibility of the CSR Committee is as follows:

- To formulate and recommend the CSR Policy to the Board for approval.
- To monitor the Policy from time to time and recommend changes to the board
- To recommend CSR projects, which are in line with the activities specified in Schedule VII, to be undertaken by the Company
- To recommend the amount of expenditure to be incurred on CSR projects
- To constitute a transparent monitoring mechanism for ensuring implementation of the CSR projects undertaken by the Company
- To provide a responsibility statement on the implementation and monitoring of the CSR Policy and that it is in compliance with CSR objectives of Intec which statement shall form part of the Boards' Report.



14. Website update

Intec shall display on its website (www.inteccapital.com) the contents of its CSR Policy, activities, projects and programs and other necessary information as may be required to be displayed.

15. Review and Audit of CSR Activities, Projects and Programs etc.

- a) The CSR committee shall be apprised on the implementation of the CSR activities and the progress shall be monitored on a quarterly basis. Intec shall through its internal process controls, monitoring and evaluation systems implement, assess, document and report the impact of its CSR activities/projects.
- b) Records relating to the CSR activities and the CSR Expenditure shall be meticulously maintained. The Records shall be submitted for reporting and audit.
- c) The financial audits of the implementing agencies shall also be done through periodic audits. In this regard, Intec may appoint independent external consultants for carrying out such audits.

16. Amendment

The Policy may be reviewed and amended from time to time as per requirement.

17. Contact Details

For queries related to CSR Policy / Activities / Projects / Programs, please write to us at:

Yamini.bansal@inteccapital.com and/or raj.anand@inteccapital.com