



***Multi-Act Trade and Investments Private Limited***  
***Corporate Social Responsibility Policy***

## **I. CONCEPT AND VISION**

The Company intends to make a positive difference to society and contribute its share towards the social cause of betterment of society and area in which Companies operates. We also believe in the trusteeship concept. This entails transcending business interests and working towards making a meaningful difference to the society.

In this regard, the Company has made this policy which encompasses the Company's philosophy for delineating its responsibility as a Corporate Citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community at large and titles as the "Corporate Social Responsibility (CSR) Policy" which is based as per the Companies Act, 2013 and rules made there under.

This policy has been formulated and adopted by the Board of Directors at its meeting. The Board may amend or modify this CSR Policy as and when necessary.

## **II. DEFINITIONS:**

- **Act** means Companies Act, 2013, as amended and modified from time to time;
- **Board** means Board of Directors of the Company;
- **Company** means MULTI-ACT TRADE AND INVESTMENTS PRIVATE LIMITED;
- **Corporate Social Responsibility (CSR)** means and includes but is not limited to:
  - 1) Projects or programs relating to activities specified in Schedule VII to the Companies Act, 2013; or
  - 2) Projects or programs relating to activities undertaken by the Board of Directors of the Company as per this policy.
- **CSR Activities** shall mean activity which is specified as per Schedule VII of the Companies Act, 2013;
- **CSR Policy** means CSR Policy of the Company;
- **CSR Rules** means the Companies (Corporate Social Responsibility) Rules, 2014, as amended and modified from time to time;
- **Employees** means Employees of the Company;
- **Funding** shall mean the disbursements that are to be made to an organization pursuant to this CSR Policy, with the prior approval of the Board in accordance with the Act and Rules;

➤ **Net Profit** means the net profit of the Company as per its financial statement prepared in accordance with the applicable provisions of the Companies Act, 2013, but shall not include the followings, namely: -

- 1) Any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise, and
- 2) Any dividend received from other companies in India, which are covered under and complying with the provisions of section 135 of the Companies Act, 2013.

Words and expressions used in this policy and not defined herein but defined under the Companies Act, 2013 shall have the same meanings respectively assigned to them.

### **III. CSR COMMITTEE:**

The requirement of constitution of the CSR Committee does not apply to the Company as the CSR spend for the Financial Year 2024-25 is less than 50 Lakhs rupees as per sub-section 9 of Section 135 of the Companies, Act 2013.

The functions prescribed under aforesaid section are performed by Board of Directors.

### **IV. THE ROLE/RESPONSIBILITIES OF THE BOARD OF DIRECTORS:**

1. Adopt the 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.
2. Spend the budgeted expenditure on the activities referred to in clause (1) above.
3. Ensuring that in each financial year the Company spends at least 2% of the average net (if Company falls under the Criteria which is specified under Section 135 of the Companies Act, 2013) profit made during the three immediate preceding financial year
4. Monitor the Corporate Social Responsibility Policy of the company from time to time.
5. Institute a transparent monitoring mechanism for implementation of the CSR projects/programs/activities.

6. Monitor implementation of CSR activities on quarterly basis.

**V. ACTIVIES TO BE UNDERTAKEN BY THE COMPANY:**

1. Promoting of education including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects;
2. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
3. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
4. 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 rejuvenation of river Ganga;
5. Protection of national 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 art and handicrafts;
6. measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
7. training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports;
8. 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

9. 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 Defence Research and Development Organisation (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);
10. Contribution 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 govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
11. Rural development projects;
12. Slum area development;
13. Disaster management, including relief, rehabilitation and reconstruction activities.

#### **VI. THE CSR APPROACH:**

The company strongly believes that sustainable community development is essential for harmony between the community and the industry. It endeavours to make a positive contribution to the underprivileged communities by supporting a wide range of socio-economic, educational and health initiatives. Also, it is committed to integrate its business values and operations to meet the expectations of all its stakeholders.

#### **VII. MONITORING:**

The Board of Directors of the company will be responsible for the monitoring of various CSR projects or programs undertaken by the company directly or indirectly. The Board shall ensure that:

- i. Company undertakes the CSR activities as provided in the CSR policy;
- ii. The projects/ programs are implemented as per the approved program;
- iii. The budget allocated for each of the project is utilized for the projects as per the approved plans;
- iv. The objective of the project/program is achieved as per the plans;
- v. Company shall provide necessary resources and human capital for implementation and the effective monitoring of the CSR projects and programs as directed. The services of any external agencies or persons who have experience in the same or similar projects or programs undertaken or proposed to be undertaken by the company may also be made available for successful implementation an monitoring of the project.

Sd/-

Sd/-

Sd/-

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Mr. Prashant K Trivedi  
Chairman

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Mr. S W Karkamkar  
Director

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Mr. MehuI Trivedi  
Director