

CORPORATE SOCIAL RESPONSIBILITY
WAY2WEALTH BROKERS PRIVATE LIMITED

Way2Wealth Securities Pvt Ltd- CSR Policy

Introduction:

Way2Wealth Brokers Private Limited is an Investment Consultancy Firm known for making investments simpler and more profitable for investors, since 2000. Way2Wealth Brokers Private Limited is a venture of Coffee Day that pioneered the coffee culture in the chained cafe segment in India. Coffee Day group is known for being vertical integrated to cut costs: from owning the plantations, growing the coffee, making the coffee machines to making the furniture for the outlets.

Way2Wealth Brokers Private Limited, a subsidiary of Coffee Day Enterprises Limited, offer a wide range of financial products & services under one roof, for the convenience and benefit of our customers.

The core businesses of Way2Wealth Brokers Private Limited along with its subsidiaries can be classified into four major categories. The broking and commission businesses comprise equity, commodity, and currency brokerage, among a number of other services; while the distribution business consists of financial product distribution. Fund-based activities finance clients for market activities. And quant businesses utilize the latest technology, like high-speed execution tools, for the electronic market.

Background, Scope and Applicability of CSR:

Way2Wealth Brokers Private Limited (hereinafter 'W2WBPL') has developed this Policy titled the 'Way2Wealth Brokers Private Limited – Corporate Social Responsibility Policy' (hereinafter 'CSR Policy') encompassing the Company, for being a responsible corporate citizens and lays down the principles and mechanisms for undertaking various programs in accordance with the provisions of Section 135 of the Companies Act, 2013 ('the Act'), and the rules and regulations made thereon from time to time, for the community at large.

This policy is applicable to W2WBPL.

I. Vision Statement:

The vision of W2WBPL is to contribute to improve the quality of life in communities in which we live and work.

II. Objective:

The policy document is an attempt to articulate the W2WSPL's social responsibility. The framework enables business heads to put in place policies and practices in line with the policy.

III. CSR Programme Focus Areas:

a. Promotion of education

Education is the basic tool to bring development in our country. We are committed to promote education to economically underprivileged rural youth and supporting them to be independent, responsible and adaptable to urban environment. Promoting of education may inter alia include but not limited to:

- conservation & renovation of school buildings & classrooms;
- providing basic educational infrastructure facilities to the children
- imparting education, providing food and accommodation, uniforms and transport facilities
- bridging the divide between the 'haves' and 'have notes'
- providing exposure to technology along with sustainable education model
- providing scholarship for education

b. Health

Health and Safety are the universal concerns. We are aiming to focus our CSR area on Health. Health concerns vary across the urban and rural divide. Issues include lack of availability to primary health care infant mortality owing to low awareness of health and hygiene. Multi dimensional approaches like funding for setting up of institutions on health and sciences, hospitals, organizing health check up camps, blood donation camps, etc, that considers the needs of the respective areas, could leads to an effective plan to address major issues in consultation with the local administrations, community workers and NGOs working in the area.

c. Environment

We are aiming to protect the environment and to take required steps for optimum utilization of environmental recourses thereby leading to sustainability. Our aim is to take necessary measures for protecting the environment in different ways like controlling environmental pollutions, to sensitize the community including the employees and the stakeholders, through personal interaction and other effective communication channels, about the optimum utilization of recourses, protecting environment and sustainability.

d. Scientific research

W2WBPL aims to extend its assistance in scientific research in various areas.

e. Eradication of hunger and poverty

There is plenty of food in the world for everyone. The problem is that hungry people are trapped in severe poverty. They lack the money to buy enough food to nourish themselves.

The problem of hunger and poverty is the biggest hurdle to development and hence, we are focusing on taking various measures like providing food, clothes, shelter, donations, for eradicating hunger and poverty starting from our community and which may spread beyond our community over the years.

f. Differently-abled Citizens

We wish to tie up with any NGO,s to work out avenues, to employ more number of differently-abled people at suitable jobs across several divisions of W2WSPL. We are aiming at recognizing social responsibility as an integral part of our corporate citizenship. Driven by our value system, we are aiming to commit for supporting and nurturing societies through innovative solutions to satisfy evolving needs of the society, with a special emphasis on people with disability.

g. Investors Education

W2WSPL is a financial advisory organization and it is aiming at enabling investors' awareness by providing investors education on various matters in financial and capital market segment.

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h. Relief for natural calamities

i. Heritage Site adoption

j. Women and Child empowerment

k. Sponsoring Sports events

l. Ban on usage of plastics bags and introducing eco-friendly paper bags in all the outlets of the Company

m. Providing medical & legal aid treatment to road accident victims and their families.

n. Enabling infrastructure for livable communities by providing clean and safe drinking water.

o. Improving quality of life among people living in rural areas through improved sanitation measures.

- p. Contribution to Prime Minister's National Relief Fund or any other fund set-up by the Central Govt. for socio-economic development and relief for the welfare of scheduled castes, scheduled tribes, other backward classes, minorities and women.**

- q. Any other program or project in areas as enumerated in Schedule VII**

Note: – the CSR gamut is covered by these broad areas but not limited to them.

IV. CSR Budgets:

At least two percent in every financial year, of the average net profits of the Company, made during the three immediately preceding financial years shall be spent for implementation of CSR projects.

Surpluses generating from CSR activities undertaken by W2WBPL will be used in further development of these CSR activities and will not be added to the normal business profits of W2WBPL.

V. Implementation Process:

- a. W2WSPL's CSR Programs will be implemented through W2WBPL's personnel or through external implementing agencies or through any Trusts, Foundations and Section 8 companies that may be established by W2WBPL from time to time. If W2WBPL uses external implementing agencies, W2WBPL will specify the CSR Programs which may be undertaken by those agencies in accordance with their objects and administrative processes laid down in the respective Trust Deeds/Memorandum and Articles of Association.
- b. W2WBPL would focus on the Country as a whole to benefit from its CSR programs with target communities being the socially and economically marginalized groups.
- c. The CSR programs will be undertaken by W2WBPL on the basis of need of assessment as done by the CSR Committee and approved by the Board and preference will be given to local areas around to which it operates.
- d. The CSR activities shall be undertaken either directly or indirectly, through one or more registered trusts or societies with an established track record of three years undertaking similar programs or projects.
- e. W2WBPL may also collaborate with other entities for undertaking CSR activities, projects or programs.
- f. The CSR Committee may formulate special team to help it regulate, manage and monitor various activities. The team will have 2 or more members as deemed fit by

the Committee, the key responsibilities, role and reporting mechanism of the team shall be clearly defined by the CSR Committee.

- g. The CSR activities, projects or programs will be undertaken in India only.
- h. W2WBPL shall not contribute any amount directly or indirectly to any political party.
- i. Any surplus arising out of CSR activities, projects or programs shall not form part of business activities of W2WBPL.
- j. W2WBPL will not publicize the CSR activities and programs undertaken by it or use them for promotional/advertising activities and benefit by it in any way to promote its objects or business activities.

VI. Governance:

- a. Every year, the CSR Committee will place for the Board's approval, a CSR plan delineating the CSR Programs to be carried out during the financial and the specified budgets thereof. The Board will consider and approve the CSR Plan with or without any modification that may be deemed necessary.
- b. The CSR Committee will assign the task of implementation of the CSR Plan within specified budgets and timeframes to such persons or bodies or entities as it may deem fit.
- c. Once the CSR Committee assigns the task of implementation of the CSR Plan, W2WBPL will be required to enter into an agreement with each of such external implementing agencies for smooth execution of CSR programs and to avoid any issues or litigations later. If no external agency is involved in the CSR execution work, then no such agreement is required. The format of such agreement will be approved by the board.
- d. The persons/bodies/entities to which the implementation is assigned will carry out such CSR Programs 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.
- e. The CSR committee shall review the implementation of the CSR Programs on a regular basis and issue necessary directions from time to time to ensure orderly and efficient execution of the CSR Programs in accordance with this Policy.
- f. Once in every three months the CSR committee will provide a status update to the board on the progress of implementation of the approved CSR Programs carried out

during the period. It shall be the responsibility of the CSR Committee to keep the board apprised of the status of implementation of the same

- g. At the end of every financial year, the CSR Committee will submit its detailed report to the Board.

VII. Composition of CSR Committee:

The composition of CSR committee of the Board of W2WBPL is as follows as on January 1, 2016:

- 1. Mr. K M Deekshith – Chairperson
- 2. Mr. H V Santhrupth – Member
- 3. Mr. Sreedhar B– Member

VIII. Responsibility of CSR Committee:

- a. Formulate and recommend CSR Policy to Board for approval
- b. Monitor the policy from time to time and recommend changes to the Board
- c. Recommend CSR activities, projects or programs which are in line with the activities specified in Schedule VII, to be undertaken by the Company.
- d. Recommend the amount of expenditure to be incurred on CSR activities, projects or programs to be undertaken by W2WBPL.
- e. Constitute a transparent monitoring mechanism for ensuring implementation of CSR activities, projects or programs to be undertaken by W2WBPL.
- f. Constitute CSR team consisting of requisite number of persons appropriate to undertake its CSR activities, projects or programs on an on-going basis.
- g. Review quarterly reporting made by CSR team for each activities, projects or programs undertaken W2WBPL from time to time.

IX. Monitoring Mechanism

- a. Each of the CSR projects and programs would have clearly defined objective, output, outcome and process indicators
- b. Reporting with respect to each project or program will have to be done at specified frequencies not less than once in a quarter. The CSR Committee will receive quarterly progress reports of all CSR activities, projects or programs W2WBPL.
- c. All projects and programs may be monitored by the W2WSPL's CSR Committee itself or through the special team formed for the said purpose. The monitoring process will cover both programs and financial reviews.
- d. The special team formed by the Committee may ensure the satisfactory implementation of projects/programs undertaken through onsite visit and surveys in the specified areas or any other means as may be deemed fit.

- e. The special team may also obtain feedback from beneficiaries about the CSR programs.
- f. All projects and programs will be subjected to an annual financial audit by a third-party auditor.

X. Responsibility of Board of Directors' of the Company:

- a. Approval of CSR policy of W2WBPL after taking into account the recommendations made by CSR Committee
- b. Disclosing the content of the Policy in its report and placing the Policy on W2WSPL'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')
- c. Ensuring that the activities as are included in the Policy are undertaken by W2WBPL.
- d. Ensuring that the W2WBPL 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.
- e. Ensuring that the board's report includes an annual report on CSR containing the particulars as per the annexure provided in Companies (Corporate Social Responsibility) Rules, 2014.
- f. Ensuring that it specifies the reasons in its report for not spending the allocated amount in case the Company fails to spend such amount.

XI. Validity of CSR Policy:

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

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