

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

OF

**SECUR CREDENTIALS LIMITED
(CIN: L74110MH2001PLC133050)**

OBJECTIVE

The objective of this CSR Policy is to lay down guidelines for SecUR Credentials Limited (hereinafter referred to as 'the Company') to make CSR as one of the key focus areas to adhere to Company's interest in environment and society that focuses on making a positive contribution to society. This Policy defines Company's Corporate Social Responsibility (CSR) approach in alignment with Section 135 of the Companies Act, 2013 read with applicable rules.

Accordingly, the activities that may be taken upon for Company's CSR initiatives may be out of any of the following as specified in Schedule VII to the Companies Act, 2013:

- (i) 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.
- (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- (iii) 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.
- (iv) 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].
- (v) 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;
- (vi) measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports;
- (viii) contribution to the prime minister's national relief 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;
- (ix) contributions or funds provided to technology incubators located within academic institutions which are approved by the central govt;

- (x) rural development projects;
- (xi) slum area development.

COMMITTEE

Pursuant to applicable provisions of section 135 of the Companies, Act 2013, Board of Directors of the Company has constituted Corporate Social Responsibility Committee for appropriate implementation of CSR activities, which is as follows:

Sr. no.	Name	Chairman/Member of CSR Committee	Designation
1.	Mr. Pankaj Vyas	Chairman	Non-Executive Chairman
2.	Mr. Rahul Belwalkar	Member	Managing Director
3.	Mr. Amit Bharti	Member	Independent Director

The responsibilities of the CSR Committee include:-

- (i) Formulating and recommending to the Board of Directors the CSR Policy;
- (ii) Identifying and recommending the CSR activities to be undertaken to the Board of Directors;
- (iii) Recommending the amount to be spent for the CSR activities;
- (iv) Undertaking all necessary steps to implement the CSR activities;
- (v) Monitoring the CSR activities from time to time;
- (vi) Submit the Reports to the Board in respect of the CSR activities undertaken by the Company;

QUORUM FOR THE MEETING

The quorum for the CSR Committee Meeting shall be one-third of its total strength (any fraction contained in that one-third be rounded off as one) or two members, whichever is higher.

FREQUENCY OF THE MEETING

The meetings of CSR Committee shall be held at such periodic intervals as may be required from time to time.

MINUTES OF THE MEETING

Proceedings of all meetings of CSR Committee must be minuted and signed by the Chairman of the Committee and tabled at the subsequent Board and Committee meetings.

CSR FUND

The CSR Committee shall recommend the project-wise annual budget expenditure to the Board of Directors for its consideration and approval. The Company shall ensure to spend in each financial year at least 2% of the average Net Profit made during the three immediate preceding financial years.

CSR EXPENDITURE

The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII of the Companies Act, 2013.

CSR REPORTING

Annual Report in prescribed format under Companies Act, 2013 containing particulars on CSR activities of the Company for the respective Financial Year shall form the part of the Board's Report of a Company.

DISCLOSURE

As per the CSR Rules, the contents of the CSR Policy shall be approved by the Board and the same shall be displayed on the Company's website, if any.

AMENDMENT TO CSR POLICY

The Board of Directors on its own and/or on the recommendation of the CSR Committee can amend this CSR Policy as and when deemed fit. Any or all provisions of CSR Policy would be subject to revision/amendment in accordance with the regulations on the subject as may be issued from relevant statutory authorities, from time to time.

This Policy has been adopted by the Board of Directors of the Company at its meeting held on 27th August, 2018.