



CAMEO CORPORATE SERVICES LIMITED

Corporate Social Responsibility Policy

1. Purpose

The Corporate Social Responsibility Policy (“CSR Policy”) of Cameo Corporate Services Limited has been formulated and approved by the Board of Directors at its meeting held on 27.10.2022.

This policy aims to contribute towards sustainable development of the society and environment to make planet a better place for future generations.

The activities enlisted in this CSR Policy are to be carried out by the company either independently or in association with eligible Implementing Agencies registered with the Ministry of Corporate Affairs.

The CSR Policy is formulated in accordance with the provisions of section 135 of the Companies Act, 2013 and rules made thereunder and other applicable laws to the company.

2. Effective Date

This policy shall be effective from the beginning of financial year 2022-23.

3. Definitions

- i. “Act” means the Companies Act, 2013.
- ii. “Board of Directors” or “Board” means the collective body of the directors of the company.
- iii. “Company” means “Cameo Corporate Services Limited”
- iv. “CSR Policy” means CSR Policy of Cameo Corporate Services Limited
- v. “CSR Rules” means the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.
- vi. “Implementing Agency” means any entity registered with Ministry of Corporate Affairs for undertaking CSR projects, which is engaged by the company to implement various projects in pursuance of CSR Policy.

Any term used in this policy but not defined herein shall have the same meaning assigned to them under the Act and CSR Rules as applicable to the company.

4. Functions of Board

As the amount to be spent by the Company under Sec.135 (5) of the Companies Act, 2013 does not presently exceed Rs.50 lakhs, the requirement under Sec 135 (1) of the Act for constitution of the Corporate Social Responsibility Committee is not presently applicable and the functions of Committee shall be discharged by the Board of Directors.

- a) To formulate a CSR Policy indicating the activities to be undertaken by the company in areas or subject specified in Schedule VII to the Act;
- b) To approve the amount of expenditure to be incurred on the activities referred to in the CSR policy formulated under clause (a) above;
- c) To formulate an annual action plan in pursuance of CSR Policy covering the following aspects:
 - i. the list of approved CSR projects or programs to be undertaken in areas or subjects specified in Schedule VII to the Act;

- ii. the manner of execution of such projects or programs as specified in rule 4(1) of CSR Rules;
- iii. the modalities of utilisation of funds and implementation schedules for the projects or programs;
- iv. monitoring and reporting mechanism for the projects or programs; and
- v. impact assessment, if any, for the projects undertaken by the company;
- d) To bring changes, if any, needed in the annual action plan with reasonable justification to that effect.
- e) To monitor the CSR Policy.

The Board should provide the approach and direction for CSR activities to be undertaken by the company and also provide Guiding principles for

- a. Selection of CSR projects / programmes / activities
- b. Implementation of CSR projects / programmes / activities
- c. Monitoring of CSR projects / programmes / activities
- d. Formulation of the annual action plan

5. CSR Activities

Company shall undertake CSR activities for development of the society and the environment, preferably in the vicinity of the areas where the facilities of the company are located.

- A. The company shall undertake such activities which are broadly related to any of the following:
 - i. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation
 - 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.
 - 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, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
 - vii. training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports
 - viii. Rural development projects
 - ix. Development of area declared as "slum area" by the Government or Competent Authority.
 - x. Disaster management, including relief, rehabilitation and reconstruction activities.
- B. The company may also contribute to the following funds as part of CSR activities:
 - i. Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.
 - ii. Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;
 - iii. 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 Government for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
 - iv. 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;
- v. 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 Defense 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).

The above areas as enshrined in Schedule VII to the Act and included in this policy aims to provide macro areas in which CSR projects should be undertaken by the company.

Any CSR activity proposed to be undertaken as a CSR initiative, but not specifically covered in the aforesaid, may be undertaken only with the prior approval of the Board.

6. Focus Areas

While the company may undertake CSR activities in any areas listed above, the focus areas of CSR activities should be on the following aspects:

- i. Health Care and Sanitation;
- ii. Education, Research and Development;
- iii. Climate Change and Sustainability initiatives;
- iv. Promotion of Art and Culture;
- v. Promotion of Sports

7. Annual Action Plan

The Board shall formulate an annual action plan which shall include the following:

- a) the list of CSR projects or programmes that are approved and to be undertaken by the company
- b) the manner of execution of such projects or programmes
- c) the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- d) monitoring and reporting mechanism for the projects or programmes; and
- e) details of need and impact assessment, if any, for the projects undertaken by the company.

The Board of Directors are empowered to alter the annual action plan during the financial year based on the reasonable justification for such change.

8. CSR Spending

The company shall endeavour to achieve the objectives of CSR Policy and allocate every year:

- a. Minimum 2% of its average net profits made during the three immediately preceding financial years
- b. Any income or surplus arising out of the CSR activities, projects or programs shall not form part of the business profit of the company and the same shall be ploughed back for use in CSR activities

All the expenditure relating to CSR shall be pre-approved by the Board.

The Chairman shall monitor the utilization of funds for the purposes set forth and certify to this effect. Unspent CSR amount, if any, shall be transferred to separate account in accordance with the applicable CSR Rules from time to time.

9. Mode of implementation

CSR programs, projects or activities of the company should be implemented through following methods:

- i. Directly by the company
- ii. Implementing Agencies

10. Need and Impact Assessment

CSR activities undertaken should be in the interest of the society and the local population preferably in the geographical area/s where the company operates. Before undertaking any project or activities the company shall conduct need assessment for the project and its utility in the demography where project is proposed.

After completion of CSR activity undertaken, a note on the impact of the initiative on the target community should be placed for consideration of the Board. This can be a key input for redesign and / or rollout of further initiatives.

11. Capital Assets

Capital asset acquired or created by CSR projects should be held by the beneficiaries of the said CSR project or a trust or a public authority for the benefits of all. The company should take appropriate measure to ensure that such assets are utilized for the purpose it was meant for and should not be transferred or disposed off without prior permission of the company.

12. Information dissemination

CSR Policy and activities undertaken shall be disseminated on website for public access and shall be published in the Annual Report of the company in the format prescribed under the Act and CSR Rules.

13. Review

The Board shall be fully responsible for the monitoring and review of the implementation of this policy in accordance with applicable laws from time to time. The Board can amend/ modify/ revise the CSR Policy.
