



Corporate Social Responsibility (CSR) Policy

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Enam Asset Management Company Private Limited

SEBI Regd. Portfolio Manager: Regn. No. INP000000225

CIN: U65991MH1997PTC111056

(Enam Asset Management Company Private Limited is not registered with SEBI as a Mutual Fund)

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1) **BACKGROUND:**

The Companies Act, 2013 (Act) read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 (CSR Rules) introduced specific provisions relating to corporate social responsibility and defined the term Corporate Social Responsibility (CSR), CSR Committee, CSR Policy, Net Profit, etc. The Act and the Rules have also laid down the criteria for complying with the provisions relating to CSR, nature of projects, programs and activities that can be undertaken as CSR activities, manner in which the CSR activities shall be undertaken, constitution of CSR Committee, formulation of CSR Policy, annual report on CSR, etc.

Accordingly, the Board of Directors (the “Board”) of Enam Asset Management Company Private Limited (the “Company” or “Enam”), has adopted a policy and standard operating procedures to undertake projects, programs and activities relating to CSR.

2) **APPLICABILITY AND EFFECTIVE DATE:**

The concept of CSR is governed by Section 135 of the Companies Act, 2013. The CSR provisions within the Act are applicable to companies:

- a) having net worth of rupees five hundred crore or more, or
- b) turnover of rupees one thousand crore or more or
- c) a net profit of rupees five crore or more during any financial year

Enam Asset Management Company Private Limited falling within the ambit of the above-mentioned clauses need to comply with the said section and the rules related to CSR. This Policy provides the framework for CSR Program of Enam Asset Management Company Private Limited and shall apply to all CSR initiatives and activities taken up by the Company at the various locations, for the benefit of different segments of the society, specially the deprived, under privileged and differently abled persons. This policy shall be effective from December 2014.

3) **DEFINITIONS:**

- a. “Act” means the Companies Act, 2013.
- b. “Board of Director” or “Board” means the Board of Directors of Enam Asset Management Company Private Limited, as constituted from time to time.
- c. “Company” means Enam Asset Management Company Private Limited.
- d. “CSR Committee” means Corporate Social Responsibility Committee constituted by the Board of Directors of the Company, from time to time, under provisions of the Companies Act, 2013.
- e. “Policy” means Policy on Corporate Social Responsibility.
- f. “Net Profit” means the net profit as defined in Section 135 of the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Rules, 2014.

4) FOCUS AREA /SCOPE OF CSR ACTIVITIES:

Enam shall undertake any of the following activities or projects or such other activities or projects as may be notified by the Ministry from time to time as part of the CSR activities:

- i) Eradicating hunger, poverty, and malnutrition, promoting preventive health care and 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;
- 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 arts and handicrafts;
- vi) Measures for the benefit of armed forces veterans, war widows and their dependents
- vii) Training to promote rural sports, nationally recognized sports and Para- Olympic sports and Olympic sports;
- viii) Contribution to the Prime Minister National Relief Fund or any other fund set up by the Central Government or the State Governments for the socio-economic development and relief and funds for the welfare of the Scheduled castes, the Scheduled Tribes, other backward classes, minorities, and women; and
- ix) Contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- x) Rural development projects;
- xi) Slum area development.
- xii) Disaster management, including relief, rehabilitation and reconstruction activities.

The following activities however will not form part of CSR activities:

- i) Activities undertaken in pursuance of the Company's normal course of business;
- ii) Activities which benefit only the employees of the company and their families;
- iii) Contribution directly or indirectly to any political parties;
- iv) Activities undertaken outside country.

5) ANNUAL SPENDS/ ALLOCATION OF FUNDS:

- 1) The Company shall strive to spend in every financial year at least 2% (two percent) of the Average net profits [as calculated under Companies (CSR Policy) Rules, 2014] of the Company made during the three immediately preceding financial years, for CSR activities.
- 2) Any surplus amount out of the CSR project or programs or activities shall not form part of the business profit of a Company.
- 3) Any unutilized amount under the annual allocation against this head will be carried forward to the next year, exclusively for this purpose.
- 4) The tax treatment of CSR spend will be in accordance with the Income Tax Act, 1961

as may be notified by Central Board of Direct Taxes (CBDT).

From the annual CSR budget allocation, Enam may also incur expenditure on the identified areas mentioned in Schedule VII of the Companies Act, 2013. Enam shall appoint any of its employees or professional for the purpose of supervising/ monitoring its CSR activities carried out at any locations in India and all such reasonable travelling/boarding expenses of such employee or professional for the purpose of supervising /monitoring the CSR activities will form part of the CSR expenses of Enam.

6) IMPLEMENTATION:

- 1) The Board of Directors of Enam will ensure that:
 - i. The activities as are included in Enam CSR Policy are undertaken by the Company;
 - ii. Enam spends in every financial year; at least 2% of the average net profits of the Company made during the three immediately preceding financial years or such other amount as may be specified by the Government.
- 2) The Company shall undertake CSR activities either by itself as stated in the CSR policy or through a registered trust or society or any company, its holding or subsidiary company under Section 8 of the Act for such non- profit objectives.
- 3) The Company shall implement the CSR programs as under:
 - a) Identify the CSR projects ;
 - b) Proposals of CSR activities will be evaluated by the CSR committee;
 - c) The CSR committee will recommend the proposal to the Board of Directors together with the quantum of the CSR expenditure to be incurred for a financial year;
 - d) Board of Directors of Enam after taking into account the recommendation made by the CSR committee, will approve the proposal and the expenditure for CSR program for a financial year;
 - e) The proposal may be implemented directly (through the help of employees or direct contribution) or through implementing partners, executing agencies which include registered trusts, societies, NGO's having an established track record in carrying out specific proposals.
 - f) The Company may collaborate with other companies for undertaking the CSR Activities subject to fulfilment of separate reporting requirements as prescribed in the Companies (Corporate Social Responsibility Policy) Rules, 2014 (the Rules).

7) CSR COMMITTEE:

- a) The CSR committee shall consist of minimum 3 members of the Board of Directors at any given point of time. If the Board of Directors of the Company consist only 2 Directors, then the two Directors will form CSR committee. A committee of the Board of Directors has been formed in pursuance of the said section. The current composition of CSR committee of the Company is:
 - (a) Mr. Jiten Doshi, Chairman
 - (b) Mr. Surin Kapadia, Member
 - (c) Mr. Rajesh Khona, Member
- b) The Committee will meet at least twice in a year. A quorum of two members is

required for the proceedings to take place.

8) MONITORING:

- a) The progress of CSR activities under implementation will be reported to the CSR Committee, through the authorised official of the Company, on a monthly / quarterly / periodic basis.
- b) The CSR Committee will have periodical inspection / investigations carried out through independent professionals for high value programs.
- c) The CSR Committee may, independently, obtain feedback from the beneficiaries about the CSR programs.
- d) Appropriate documentation of the Enam CSR Policy, annual CSR activities, executing partners, and expenditure entailed will be undertaken on a regular basis.
- e) CSR initiatives of the Company will also be reported in the Annual Report of the Company.

9) DISCLOSURES:

The policy for the Corporate Social Responsibility is to be uploaded at www.enamamc.com

10) GENERAL:

In case of any doubt, ambiguity, or clarification with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to CSR Committee of the Board. In all matters, the interpretation and decision of the CSR Committee shall be final.

Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the amendments in the Companies Act, 2013 or Companies (Corporate Social Responsibility Policy) Rules, 2014 and any guidelines on the subject as may be issued from Government, from time to time.

The Board reserves the right to amend, modify, cancel, add, or alter any provisions of this Policy as it deems fit to comply with the statutory obligation of the Company to undertake CSR activities.

Projects approved by the Board for FY 2020-21:

Name	Purpose
Anugraha Pratham Trust	For providing training, providing care and residential accommodation for special children and old age homes.
BAPS	Training and education of underprivileged children
Bhumi Jeevdaya Samvardhan Trust	Ensuring environmental sustainability and animal welfare
Kailash Satyarthi Children's Foundation	For Training, educating and safety of children in society.
Conwest & Manjula S Badani Jain Hospital	Eradicating hunger and poverty and malnutrition, promoting health care including preventive healthcare and sanitation
Mukul Madhav Foundation	Training and educating children.
Rotary Club of Bombay Queens Necklace Charitable Trust	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
Shri Kund Kund Kahan Prathamik Trust	Training and educating underprivileged children
Shree Raj Saubhag Satsang Mandal	Training and educating children
Shri Ram Janmbhoomi Teerth Kshetra	Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art
Shrimad Rajchandra Adhyatmik Satsang Sadhana Kendra	Training and education of underprivileged children
Shrimad Rajchandra Education Trust	Training and education of underprivileged children
Vivekananda Youth Connect Foundation	Ensuring environment sustainability, training, and development of youth
Shrimad Rajchandra Sarvamangal Trust	Training and education of underprivileged children
Bal Ashram Trust	For providing training, education providing care and residential accommodation for children
Sri Sri Ravishankar Vidya Mandir Trust	Training and educating children
Shree Saurashtra Dashashrimali Seva Sangh	Training and educating children
Shri Tankara Education Society	Training and education of underprivileged children