

ANI MEDIA PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. Guiding Principle

CSR is the process by which an organization thinks about and evolves its relationship with stakeholders for the common good, and demonstrate its commitment in this regard by adopting appropriate business processes and strategies. Thus, CSR is not charity or mere donations, but a way of conducting business, by which corporate entities visibly contribute towards the use of resources to engage in activities that increase not only their profits but contribute to overall development of the environment in which they operate. They use CSR to integrate economic, environmental and social objectives with the company's operation and growth.

2. Background

ANI Media Private Limited (ANI/the Company) is committed to the well-being of all stakeholders and not just shareholders and employees. **ANI** over the past several years has been socially responsible and has voluntarily undertaken various Corporate Social Responsibility initiatives even when there were no legal and statutory requirements in this regard.

At ANI, social responsibility starts from the top and percolates down till the junior-most level. The Company strongly believes that apart from extending regular financial help to the weaker and less privileged sections of the society, the most effective way of discharging the Corporate Social Responsibility by a Company shall be to adopt a business policy which includes actions and initiatives that are not mandated by any statutes, but are voluntarily taken so as to benefit society.

At ANI, we have voluntarily reduced the usage of paper to the maximum possible by using online facilities to send all official communication to our customers on a regular basis. We have also resorted to online facilities for all our Internal Communications like inter-office memos, all employees' claims, all official notifications to employees etc. This way the Company has contributed to the conservation of the environment by helping in preservation and protection of trees.



3. CSR Vision Statement and Objective

3.1 Our mission is to improve quality of life of the community in which we operate through integrated development.

3.2 The Objectives of this policy is to:

- Promote a unified approach to CSR - to incorporate under one umbrella the diverse range of the philanthropic activities, thus enabling maximum impact of the CSR initiatives.
- Ensure an increased commitment at all levels in the organization, to operate in an economically, socially and environmentally responsible manner while recognising the interests of all it's stakeholders.
- Encourage employees to participate actively in the Company's CSR and give back to the society in an organized manner through the employee volunteer programme.

4. Scope and Applicability

This policy shall be applicable to ANI Media Private Limited.

5. Policy Statement

5.1 Core Ideology

For ANI, responsible business practices include being responsible for our business processes, products; and engaging in positive relations with employees, customers and the community. For the Company, Corporate Social Responsibility goes beyond simply adhering to the statutory and legal compliances but aims at creating social and environmental value while supporting the company's business objectives and reducing operating costs; and at the same time enhancing relationships with key stakeholders and customers.

5.2 Total outlay for each financial year

The Company in every financial year commencing from 1st April, 2014 shall commit such amount which the Board may approve, based upon recommendation of CSR Committee, provided that the committed amount shall not be less than the statutory prescribed amount i.e. 2% of the average net profits made during the three immediately preceding financial years specifically towards CSR initiatives.



5.3 Allocation of Resources & Thrust Areas

The Company will manage CSR initiatives which meet the needs of the local communities where we operate. Our commitment to CSR will be manifested by investing resources in any of the following areas:

- Eradicating hunger, poverty and malnutrition, promoting preventive healthcare 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;
- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centers and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro-forestry, 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;
- 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;
- Measures for the benefits of armed veterans, war widows and their dependents;
- Training to promote rural sports, nationally recognized sports, Paralympics sports and Olympics sports;
- Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Schedule Castes, the Scheduled Tribes, other backward classes, minorities and women;



- Contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- Rural Development projects
- Slum area development

However, the Company shall give preference to spending on "Girl Child Education" and "Women Empowerment."

ANI may make contributions to the Corporate Foundations/Trusts, either towards its corpus or directly for its projects and may also itself undertake CSR activities.

The surplus arising out of the CSR activities will not be considered as a part of the business profits of the Company.

5.4 Implementation

(a) The CEO shall be responsible for the implementation of the CSR Policy.

(b) The CEO shall report to the Board in case the Company fails to spend minimum necessary amount. The CEO's report to the Board shall specify reasons for not spending the amount.

(c) The CSR Committee will review the expenditure made on the CSR activities and confirm to the Board that expenditure incurred is as per amount recommended for expenditure.

(d) The Board of Directors will ensure that the activities included in the CSR policy are undertaken and complied with by the Company and confirm that the Company spends, in every financial year at least two percent of the average net profits made during the three immediately preceding financial years and ensure that the Company gives preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR activities.

5.5 Executing Agency/Partners

CSR initiatives will be undertaken by the Company with the active involvement of employees or with other Not for Profit Organizations having an established track record of at least three years in carrying on the specific activity.

The CSR activities may also be undertaken by Company through their own or subsidiary or associate company's registered society or trust or a Section 8



Company. The CSR activities may also be undertaken in collaboration with other companies where such collaborating companies are in a position to report separately as per the reporting requirements under the Companies Act, 2013 and Rules thereunder.

The following minimum criteria will be ensured while selecting NGOs/voluntary organizations for programme execution:

- The NGO is a registered Society / Public Charitable Trust/Section 8 Company
- The NGO has a permanent office / address in India
- The NGO has a valid Income Tax Exemption Certificate

6. Modification

Any modification / changes to this Policy shall be made only with the approval of the Board of Directors of the Company on recommendation of CSR Committee.

