

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

1. OVERVIEW AND CSR PHILOSOPHY

BNK Securities Private Limited (“the Company”) believes in a philosophy of adopting sustainable business practices which are beneficial to various stakeholders including the society. Through its corporate values, the Company constantly endeavours to actively contribute to the social and economic development of the communities in which it operates. Along with sustained economic performance environmental and social stewardship is also a key factor for holistic business growth.

The Company has always believed in giving back to the society and recognized its role and responsibility as a corporate citizen. The Company has social values ingrained into its culture and manner of working.

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

2. DEFINITIONS

2.1."Act" means the Companies Act, 2013.

2.2."Board of Directors" or "Board" means the collective body of the directors of the Company.

2.3."Company" means BNK Securities Pvt. Ltd.

2.4."CSR Committee" means Corporate Social Responsibility Committee constituted by the Board of Directors of the company.

2.5."CSR Policy" means CSR Policy of the Company.

2.6."CSR Rules" means the Companies (Corporate Social Responsibility Policy) Rules, 2014 as amended from time to time.

2.7."FY" means Financial Year.

2.8. "Net profit" means the net profit of a Company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely: -

- a.** any profit arising from any overseas branch or branches of the company, whether operated as a separate company or otherwise; and
- b.** any dividend received from other companies in India, which are covered under and complying with the provisions of section 135 of the Act.

2.9."Ongoing Project" means a multi-year project undertaken by the Company in fulfilment of its CSR obligation having timelines not exceeding three (3) years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the Board based on reasonable justification

BNK SECURITIES PVT LTD

2 PALM AVENUE, KOLKATA 700019

CIN No: U67120WB1995PTC071182



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.

3. CSR PROJECTS, PROGRAMS AND ACTIVITIES

The Company may undertake various CSR projects, programs and activities through direct or through one or more Trust(s)/NGO(s) from time to time. The Company may also contribute towards any existing or ongoing CSR projects, programs and activities. Such projects, programs and activities will be undertaken keeping in mind the CSR philosophy of the Company and in alignment with the permissible activities under the Companies Act, 2013 and rules framed under (as amended from time to time). It shall be at the discretion of the Company to undertake, modify, implement and cancel CSR projects, programs and activities from time to time as it deems fit. The Company's focus has always been to contribute to the sustainable development of the society & environment and to make our planet a better place for future generation.

The Company's focus is to implement programme that aims at community development and inclusive growth, to undertake social responsibilities by promoting harmonious social development. The Company will focus its activities on assisting/providing in association with other persons, hostel & other accommodation facilities for deserving persons of the society.

Without prejudice to the generality of the aforesaid, the Company may from time to time undertake any project, program and activity on one or more of the following areas:

- 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;
- 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 centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward group;
- 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;
- 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;

BNK SECURITIES PVT LTD

2 PALM AVENUE, KOLKATA 700019

CIN No: U67120WB1995PTC071182



- 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;
- Training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports;
- Contribution to the 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;
 - a. 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; and
 - b. 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 Homeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defence Research and Development Organisation (DRDO); 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);
- Rural development projects;
- Slum area development;
- Disaster management, including relief, rehabilitation and reconstruction activities;

Further, in accordance with the law, below mentioned activities undertaken by a Company shall not constitute CSR activities of the Company:

- Activities undertaken in pursuance of normal course of business of the company;
- Any activity undertaken by the company outside India except for training of Indian Sports personnel representing any state or union territory at national level or India at international level;
- Contribution of any amount directly or indirectly to any political party under section 182 of the Act;
- Activities benefitting the employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);
- Activities supported by the company on sponsorship basis for deriving marketing benefits for its products or services;
- Activities carried out for fulfilment of any statutory obligations under any law in force in India.

BNK SECURITIES PVT LTD

2 PALM AVENUE, KOLKATA 700019

CIN No: U67120WB1995PTC071182



4. MODE OF CARRYING OUT CSR ACTIVITIES

The Company may carry out the CSR activities either on its own, or through a trust or registered society or through NGO or through a company registered under Section 8 of the Companies Act, 2013 or through one or more of the modes in such manner as it deems fit. The Company may also collaborate with other companies for undertaking projects, programs and activities in such manner as it deems fit.

5. CSR COMMITTEE

The Board of Directors of the Company shall constitute a committee called the “Corporate Social Responsibility Committee” (“CSR Committee”) in accordance with the provisions of Companies Act, 2013 and rules made thereunder. The Corporate Social Responsibility Committee will consist of two or more Directors or such other number of directors as the Board of Directors of the Company may determine from time to time. The Board of Directors may change the composition of the CSR Committee from time to time in such manner as it thinks fit.

Subject to provisions of Companies Act, 2013 and rules made thereunder, the CSR Committee may meet at such intervals, in such manner and may carry out matters in such manner and function generally as per such guidelines as it deems fit.

The CSR Committee shall have, inter alia, the following roles, powers and responsibility:

- (i) Formulate and recommend the CSR Policy and any amendments therein to the Board of Directors of the Company;
- (ii) Develop and approve various CSR projects, programs and activities to be undertaken from time to time either directly by the Company or through other entities;
- (iii) Determine modalities of execution of such CSR projects, programs and activities;
- (iv) Undertake all necessary steps to implement the CSR activities;
- (v) Authorise and approve CSR expenditure from time to time subject to the limits approved by the Board of Directors;
- (vi) Monitor the CSR activities in such manner as it deems fit;
- (vii) Carry out all such acts, deeds, matters and things as may be required in connection with aforesaid matters and generally for any matter connected with the CSR policy of the Company;
- (viii) To perform such functions as may be entrusted by the Board of Directors from time to time.

BNK SECURITIES PVT LTD

2 PALM AVENUE, KOLKATA 700019

CIN No: U67120WB1995PTC071182



6. ANNUAL ACTION PLAN

6.1. The CSR Committee shall formulate and recommend to the Board, 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 monitoring and evaluation, if any, for the projects undertaken by the company.

6.2. The Board of Directors are empowered to alter the annual action plan during the financial year, if so, recommended by the CSR Committee, based on the reasonable justification for such change.

7. CSR SPENDING

The Company may, in every financial year, spend such amounts on its CSR activities as the Corporate Social Responsibility Committee may authorise from time to time subject to the limits as approved by the Board of Directors. Any surplus arising out of CSR projects, programs and activities shall not form part of the business profits of the Company.

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

- Minimum 2% of its average net profits made during the three immediately preceding financial years.
- The amount would be calculated as per the provisions of the Act.
- All reasonable efforts will be made to ensure that the annual CSR allocation is fully utilized in the respective year.
- 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 CSR Committee.
- 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).

The Chief Financial Officer of the Company shall monitor the utilization of funds for the purposes set forth and certify to this effect.

8. UNSPENT CSR COMMITMENT

The Company should spend the entire amount of CSR commitments during the year in which the same is required to be spent pursuant to Section 135 of the Act.

BNK SECURITIES PVT LTD

2 PALM AVENUE, KOLKATA 700019

CIN No: U67120WB1995PTC071182



However, if the Company fails to spend such amount, pursuant to the provisions of Section 134 of the Act, the Board of Directors shall in its report, specify the reasons for not spending the amount. The unspent CSR funds for FY (if any) shall be transferred to the separate account named as "Unspent CSR Account" opened with the scheduled bank within 30 days from the date of end of the FY provided such funds are earmarked to Ongoing Projects. The funds earmarked for Ongoing projects whether approved by the Board at the beginning of the financial year or within a prescribed timeline; such funds shall also be transferred to the Unspent CSR Account. Further, the funds shall be utilized for succeeding 3 FY as enumerated in the sub-section (5) of section 135 of the Act and CSR Rules and any amendments introduced by MCA in due course. The unspent funds (if any) that are not pertaining to Ongoing Projects, shall be transferred to a Fund specified in Schedule VII, within period of six months of the expiry of the FY.

9. GENERAL

All administrative expenses including expenditure on wages & salaries, tours and travels, training & development of personnel deputed on CSR activities would be borne from CSR funds. The Board shall ensure that the administrative overheads shall not exceed 5% of total CSR expenditure of the Company for the FY. If it is observed that any CSR activity taken up for implementation is found not properly implemented, the CSR Committee at its discretion may discontinue funding the project at any time during the course of implementation.

10. IMPACT ASSESSMENT

CSR activities undertaken should be in the interest of the society and the local population where the Company operates. Before undertaking any project or activities the Company shall conduct an impact assessment for the project and its utility in the demography where project is proposed if the average CSR obligation of the Company in the three immediately preceding FY is INR 10 crores or more.

All CSR activities and expenses made thereon will be subject to audit by the Company's auditors. After one year of completion of CSR project, the Company should consider conducting an impact assessment of the project through an independent agency, so completed and place a report for consideration of the Board. A summary of impact assessment outcome shall be disclosed in the Board's Report.

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.

BNK SECURITIES PVT LTD

2 PALM AVENUE, KOLKATA 700019

CIN No: U67120WB1995PTC071182



12. MONITORING PROCESS

CSR Committee shall monitor the implementation of various programs, projects and activities in such manner as it deems fit. CSR Committee shall ensure that a transparent monitoring mechanism is put in place.

Without prejudice to the generality of the contents of this policy, the Company may undertake CSR projects, programs and activities as permitted under the framework of Companies Act, 2013 from time to time (including any amendments, clarifications, circulars, notifications or other official communications from time to time). The Company may also carry out the purposes of this CSR policy in accordance with any amended position of law from time to time notwithstanding that such amended position is not reflected in this policy.

13. INFORMATION DISSEMINATION

The Board shall disclose the composition of the Committee, contents of the Policy in its report and the same shall also be placed on the website of the Company including Projects approved by the Board.

14. REVIEW

The CSR Committee 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 CSR Committee shall provide recommendations as and when it deems necessary to the Board so as to amend/modify/ revise the CSR Policy.

This updated Policy is duly approved by the Board on *15th March, 2025* and shall be effective from that day itself.

Original CSR Policy was approved and adopted on *14th July, 2022*.