

**SCREEN-MAGIC MOBILE MEDIA  
PRIVATE LIMITED**

**CORPORATE SOCIAL  
RESPONSIBILITY (CSR)  
POLICY**

## INDEX

<b>1.</b>	<b>Background</b>
<b>2.</b>	<b>CSR policy</b>
<b>3.</b>	<b>Vision Statement and Objective</b>
<b>4.</b>	<b>CSR Committee</b>
<b>5.</b>	<b>Projects, Programs and Activities</b>
<b>6.</b>	<b>CSR Budget, Expenditure and Allocation</b>
<b>7.</b>	<b>Implementation</b>
<b>8.</b>	<b>Monitoring Mechanism</b>
<b>9.</b>	<b>Reporting</b>
<b>10.</b>	<b>General</b>
<b>11.</b>	<b>Amendment</b>
<b>12.</b>	<b>Effective Date</b>

## **SCREEN-MAGIC MOBILE MEDIA PRIVATE LIMITED**

### **CORPORATE SOCIAL RESPONSIBILITY POLICY**

#### **1. Background**

Screen-Magic Mobile Media Private Limited (the Company) came into existence in 2008 it was founded by Mr. Nitin Seth, Mr. Sandip More and Mr. Vivek Singal. The Company is engaged in the wireless technologies, information technologies, multimedia technologies, telecommunication technologies and all such other media and technology.

Corporate Social Responsibility policy (hereafter referred to as 'Policy') of Screen-Magic Mobile Media Private Limited has been designed in consonance with Section 135 of the Companies Act, 2013 (hereafter referred to as 'Act') to lay down the guidelines for undertaking Corporate Social Responsibility (hereafter referred to as 'CSR') initiatives at Screen-Magic Mobile Media Private Limited in accordance with the Companies (Corporate Social Responsibility Policy), Rules, 2014 (hereafter referred to as 'Rules'). The Policy lays down the guiding principles that shall apply to all CSR programs/projects as per Schedule VII of the Act within the geographical limit of Republic of India, to benefit marginalized, poor and deprived sections of society and for contributing towards environmental sustainability.

#### **2. CSR POLICY**

This CSR Policy encompasses the philosophy of the Company for social responsibilities and lays down the guidelines and mechanism for undertaking projects, programs and activities towards such responsibilities.

#### **3. VISION STATEMENT AND OBJECTIVE**

The CSR Policy sets out the Company's commitments towards ensuring that our activities extend beyond business and include initiatives and endeavours for the benefit and development of the community and society. The Company sees CSR as the commitment of businesses to manage and improve the economic, environmental and social implications of our activities at local, regional and global levels by undertaking appropriate and effective initiatives. The CSR Policy lays down guidelines for undertaking programmes geared towards social welfare activities or initiatives. Through this CSR Policy, we propose to adopt the CSR Activities mentioned at point 5 of Objectives.

This CSR Policy has been framed in accordance with the applicable provisions of the Companies Act 2013 and the rules issued thereunder.

The Objectives of this CSR Policy is to:

- a. Outline projects, programs and activities to be undertaken by Screen-Magic Mobile Media Private;
- b. Specify the modalities of execution of such projects, programs and activities;
- c. Monitor the process to be followed for such projects, programs and activities;
- d. Directly or indirectly take up programs that benefit the communities in and around its work centers and results, over a period of time, in enhancing the quality of life and economic well-being of the local populace; and

- e. Generate community goodwill for the Company and help reinforce a positive and socially responsible image, through our CSR Activities.

#### **4. CSR COMMITTEE**

The CSR Committee has been constituted in accordance with the provisions of Sub-Section (1) of Section 135 of the Companies Act, 2013.

The CSR Committee comprises 2 (Two) Directors i.e. Mr. Nitin Seth and Mr. Sandip More. Mr. Nitin Seth will be the Chairman of the Committee. The CSR Committee may invite other experts/ invitees as per its requirements.

The CSR Committee shall be responsible for:

1. Formulating the CSR Policy, including the CSR Activities and their budgets as well as recommendation of any subsequent changes/ modifications to the CSR Policy;
2. Institute an implementation and monitoring mechanism for CSR Activities;
3. Periodically updating the Board on the progress being made in the planned CSR Activities;
4. Providing a responsibility statement in the Board's report.

#### **5. PROJECTS, PROGRAMS AND ACTIVITIES**

1. Screen-Magic Mobile Media Private Limited shall deploy its resources for any of the CSR activities specified under Schedule VII to the Companies Act, 2013 as applicable at present and amended from time to time and should be within the scope of the following activities.
  - i. Eradicating hunger, poverty and malnutrition, promoting health care including 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, woman, 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 back ward groups;
  - iv. 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;
  - 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 windows and their dependents;

- vii. Training to promote rural sports, nationally recognized 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 Government for social-economic development and relief and welfare of the Scheduled Castes, the Scheduled 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 Government;
  - x. Rural development projects;
  - xi. Such other activities as may be specified under the Act or the CSR Rules from time to time.
2. The CSR Activities will be carried out in a manner that the preference is to undertake the CSR Activities in and around the local areas where the Company operates.
  3. The CSR Committee shall undertake sufficient due diligence in respect of each of the CSR Activity before it is implemented.
  4. Based on the recommendations of the CSR Committee, the Board shall approve the following:
    - (i) The specific CSR Activities that should be undertaken from time to time;
    - (ii) The amount of the CSR Expenditure on each of the CSR Activity; and
    - (iii) Whether the CSR Activities will be undertaken directly or through an implementing agency or in collaboration with any other companies, including by availing services of any NGOs and record reasons for the same.
  5. Activities undertaken in pursuance of the normal course of Screen-Magic Mobile Media Private Limited business shall not be considered towards CSR Expenditure.

## **6. CSR BUDGET, EXPENDITURE AND ALLOCATION**

The Company will spend the CSR expenditure on the CSR Activities mentioned at point 5 above as per the provisions of the Companies Act, 2013 and the CSR Rules, 2014 as amended and applicable from time to time.

The Board shall approve the allocation of the CSR Expenditure on the CSR Activities on recommendations of the CSR Committee.

The Board shall ensure that a minimum of 2% of the average net profits of the Company of the 3 immediately preceding financial years is spent on the CSR programs / activities of the Company.

If in case the earmarked CSR amount i.e. 2% of the average net profits of the Company of the 3 immediately preceding financial years is not spent in every financial year, reasons for the same shall be specified in the Board's report.

While spending the earmarked CSR amount, the company shall give preference to the local area and areas around which it operates, for Corporate Social Responsibility activities.

All expenditure towards the CSR programs / activities shall be diligently documented.

If the Company fails to spend the earmarked CSR amount, it shall transfer such unspent amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

In case the earmarked unspent CSR amount belongs to any ongoing project remains unspent, that unspent CSR amount shall be transferred by the company within a period of thirty days from the end of the financial year to a special account to be opened by the company in that behalf for that financial year in any scheduled bank to be called the Unspent Corporate Social Responsibility Account, and such amount shall be spent by the company in pursuance of its obligation towards the Corporate Social Responsibility Policy within a period of three financial years from the date of such transfer, failing which, the company shall transfer the same to a Fund specified in Schedule VII, within a period of thirty days from the date of completion of the third financial year.

Any surplus generated out of the CSR programs / activities of the Company will not be added to the normal business profits of the Screen-Magic Mobile Media Private Limited.

## **7. IMPLEMENTATION**

The CSR initiatives will be implemented either directly by the company through its CSR team and employees or by other implementing partners such as other corporates, registered Societies, Trusts, Section 8 Company or a firm registered under Companies Act 1956/2013.

## **8. MONITORING MECHANISM**

To ensure effective implementation of the CSR projects, programmes and activities undertaken in terms of this CSR Policy, the progress of each such project, programme and activity will be reported to the CSR Committee with all requisite documentation which in turn will report the same to the Board.

The CSR Committee shall also try to obtain feedback from the beneficiaries of the CSR projects, programmes and activities. If considered necessary, the effectiveness of the various programs/ activities undertaken under the CSR Policy may be got evaluated through external agencies for providing the required feedback and inputs to formulate and improve the programs in future.

## **9. REPORTING**

1. The CSR Committee shall maintain proper minutes of all its meetings.
2. The CSR Committee shall prepare an annual report on CSR with such information and particulars as may be required by the Act and such report shall be included in the Board's report annexed to the financial statements.
- 3 The Board's report shall include an annual report on CSR containing such details as may be prescribed from time to time under the Act and the CSR Rules.

4 The Board will be responsible to ensure that the statutory requirements as may be prescribed from time to time under the Act and the CSR Rules are complied with.

#### **10. GENERAL**

Any surplus arising out of the CSR projects/programs or activities shall not form part of the business profits Screen-Magic Mobile Media Private Limited.

All administrative and other expenses spent on CSR Activities may be borne from CSR funds, if deemed necessary.

If it is observed that any CSR Activity taken up for implementation is found not properly implemented, the CSR Committee may, with approval of the Board, discontinue funding the project at any time during the course of implementation and use such funds for any other project.

#### **11. AMENDMENT**

The CSR Committee is empowered to amend or modify the CSR Policy and such changes shall be placed before the Board for its approval. The Board may subject to compliance with applicable law at any time approve or alter, amend or modify the CSR Policy as it deems fit to comply with the statutory obligation to undertake the CSR Activities.

#### **12. EFFECTIVE DATE**

The CSR Policy shall be effective from the date of its approval by the Board of Directors.

This CSR policy is approved on this 20<sup>th</sup> April, 2021 at Pune

**FOR SCREEN- MAGIC MOBILE MEDIA PRIVATE LIMITED**

**NITIN SETH  
DIRECTOR  
(DIN-01520754)**

**SANDIP MORE  
DIRECTOR  
(DIN-05003970)**

**DATE: 20/04/2021  
PLACE: PUNE**