

**CSR Policy**  
**For**  
**Sharekhan Limited**  
**(updated till November 12, 2020)**

**About Sharekhan**

Sharekhan Limited (hereinafter referred as the “Company” or “Sharekhan”) is a subsidiary of BNP Paribas SA and is one of the leading retail broking houses in India with a nationwide presence through 153 branches and over 2500 franchisees serving 1.5 million customers.

Sharekhan offers its services to all types of customers- individual investors and traders, corporate, institutional and NRIs; trade execution facilities for cash as well as derivatives, on BSE and NSE, depository services (NSDL & CDSL), mutual funds distribution and initial public offerings (IPOs). Sharekhan provides market related news, stock quotes fundamental and statistical information across equity, mutual funds, IPOs and much more.

Additionally Sharekhan through its subsidiaries is also engaged in the Financing (NBFC), Investment Advisory and Education business. Sharekhan is part of BNP Paribas group, which has its presence in 184 countries.

**Sharekhan’ Approach to CSR**

For the Sharekhan group, implementing its Corporate Social Responsibility (CSR) policy means financing the real economy while striving to protect the environment and fight against exclusion.

After the takeover of Sharkehan group by BNP Paribas SA, the Company has adopted the Corporate Social Responsibility policy of BNP Paribas India which is rooted in Four pillars, in which actions as a responsible Company take concrete form:

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## The 4 pillars of Sharekhan CSR Policy



BNP Paribas companies in India have established the BNP Paribas India Foundation as the common and collective social arm of the group to further the Civic Responsibility. The India Foundation will help align the overall group CSR vision & philosophy and operationalize, coordinate, monitor and evaluate the implementation of the CSR vision by engaging with various internal and external stakeholders.

## **Title and Applicability**

This CSR Policy has been prepared in line with the provisions of Section 135 of the Companies Act 2013. This policy shall apply to all Corporate Social Responsibility (CSR) initiatives, projects, programmes, and activities undertaken by the Company.

This Policy shall serve as a guiding document to help identify, execute, and monitor CSR projects in keeping with the spirit of the Section 135 of the Company Act 2013 and Companies (Corporate Social Responsibility Rules), 2014.

## **CSR Programme Areas**

The programme areas shall be aligned with those of the BNP Paribas Foundation. These are in keeping with activities listed in schedule VII of Section 135 of the Companies Act 2013. The Company through its CSR activities will support programmes/projects and activities from among the following areas of action:

### **1. Education:**

- 1.1. Supporting intervention to strengthen primary and secondary education of underprivileged children.
- 1.2. Improving access to education for children from disadvantaged backgrounds by supporting interventions for primary and secondary education.
- 1.3. Working towards improvement in the quality of education through teacher training, school leadership training, exposure trips or similar activities.
- 1.4. Promoting special education for differently abled children
- 1.5. Support technical training institutes, skill development centres, non-formal vocational programmes for the purpose of creating livelihood opportunities, soft skills training and capacity building for rural youth.

### **2. Gender equality and Women's Empowerment**

- 2.1. Empower women by supporting them in the formation of self-help groups and facilitate establishing credit linkages with financial institutions for availing loans to start small enterprises.
- 2.2. Undertake training for women on financial literacy and market linkage, enhance their vocational skills, conduct credit counselling and provide them with the knowledge on becoming successful entrepreneurs.

### **3. Healthcare**

- 3.1. Support fully equipped mobile medical vans that travel through select remote rural regions in India and provide primary health care services to the underprivileged that lack basic access to health services.
- 3.2. Support provision of clean and safe drinking water to rural communities.
- 3.3. Development and construction of water tanks and rain-water harvesting schemes in villages.
- 3.4. Support provision of better sanitation services. Activities may include conducting awareness campaigns on improved sanitation techniques, easy access to safe drinking water and water storage and treatment techniques to reduce the spread of water borne diseases.
- 3.5. Provide food to the community members who are unable to afford the same and also provide nutritional supplements/fortified food to tackle the issue of malnutrition.
- 3.6. Support research centers/institutes working in the field of innovative medicine to combat infectious diseases. Support new research projects in medicine and healthcare.

### **4. Art & Culture**

- 4.1. Maintenance and conservation of monuments and sites of archaeological and heritage value.
- 4.2. Promotion of literary, visual and performing arts and preservation of ancient traditions such as ancient Indian musical instruments.
- 4.3. Maintenance, preservation and conservation of archival records and archival libraries.
- 4.4. Promotion and strengthening of regional and local museums.
- 4.5. Contributing towards the restoration of ancient heritage works, and support the publication of books highlighting valuable collections from museums.

### **5. Rural Development**

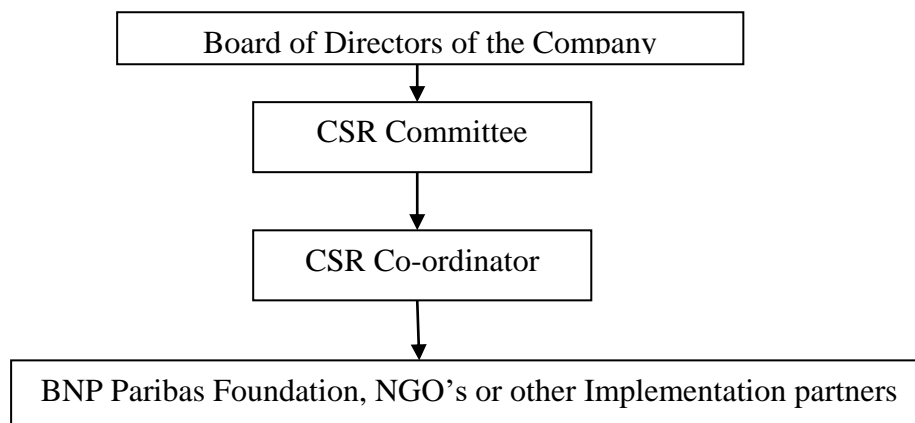
- 5.1. To develop infrastructural facilities for providing electricity through solar lights or alternate renewable energy to nearby villages.
- 5.2. Promoting self/gainful employment opportunities by training rural youth for jobs such as welding, fabrication, and other electronic appliances.
- 5.3. Undertaking projects that work towards the overall village/community development in rural areas, encompassing areas such as access to healthcare and education, improving the environment, infrastructure, promoting livelihood generation activities, etc. This

may include projects like community resources management (water, sanitation, community (panchayat) areas, road and rail development, hospitals or health centers, schools, anganwadi centres.)

## 6. Environment

- 6.1. Organizing sensitization programmes on environment management, harmful effects of climate change, water pollution, and pollution control, among others.
7. Contribution to Prime Minister's National Relief Fund/ any other fund set up by the Central Government Government or any other initiative, as may be authorized by the Board of Directors.
8. Any other areas as may be prescribed under Schedule VII of the Companies Act, 2013.

### Governance Structure



### Responsibility of CSR Committee Members

As per the provisions of the Companies Act 2013 and the Rules of the Act, the Board of directors of Sharekhan shall:

1. After taking into account the recommendations made by the CSR Committee, approve the CSR Policy for the company and disclose contents of such Policy in its report and also place it on the company's website, if any, in such manner as may be prescribed.
2. Ensure that the Companies CSR activities are in keeping with its Corporate Social Responsibility Policy.

3. Ensure that the Company spends, in every financial year, at least 2% of the average net profits of the Company made during the three immediately preceding financial years, in pursuance of its CSR Policy.
4. If the Company fails to spend such amount, the Board of Directors shall, in their report made under clause (o) of the sub-section (3) of the section 134 of the Companies Act 2013, specify the reasons for not spending the amount.
5. The Board of Directors shall have the power to make any change(s) in the constitution of the CSR Committee.

### **Composition of CSR Committee**

The composition of the CSR Committee of the Sharekhan is as under:

<b>Sr. No.</b>	<b>Name</b>	<b>Designation/Category</b>
1	Ambreesh Murty, Independent Director	Committee Member
2	Jaideep Arora, CEO & Whole Time Director	Committee Member
3	Shankar Vailaya, Whole Time Director	Committee Member
4	Franciska Decuypere, Director and Head Territory - India, BNP Paribas	Committee Member
5	Shankar Ramkrishnan	Permanent Invitee Member

### **Roles of the CSR Committee**

As defined under the provisions of the Companies Act 2013, the CSR Committee shall:

1. Prepare, revise and modify the CSR Policy for Sharekhan and place the same with the Board of Directors for their approval.
2. Provide guidelines for selection of projects/programmes and implementing partners to the CSR Coordinators and ensure that the programmes/projects undertaken by the Company are aligned with its approved CSR policy and Schedule VII of the Section 135, Companies Act 2013.
3. Review and approve annual budgets with respect to CSR programmes.
4. Develop a framework for monitoring of the CSR projects/programmes.
5. Assist the Board of Directors in preparation of the annual CSR report as required to be filed under the provisions of the Companies Act 2013/CSR Rules;

6. Review the findings and recommendations regarding CSR initiatives from any investigation or audit conducted by regulatory agencies or external auditors or consultants;
7. In case the Company is not able to spend the stipulated 2% of the average net profits of the preceding three financial years or any part thereof, the CSR Committee shall provide the reasons for not spending the amount to the Board of Directors;
8. Respond to any query, observation or clarification sought by the Ministry of Corporate Affairs or any other regulatory authority with regard to the Sharekhan's CSR initiatives;

### **CSR Budget**

The CSR Committee shall recommend the amount of expenditure to be incurred on the CSR activities to be undertaken by Sharekhan as specified in Schedule VII of the Companies Act 2013.

In case of any surplus arising out of CSR projects, the same shall not form part of business profits of Sharekhan.

### **Implementation**

Sharekhan shall implement its CSR programmes/projects:

- a) Through the group's India CSR Foundation – i.e. BNP Paribas India Foundation; or
- b) Through an implementation partner that may be a public charitable trust or a society registered under applicable Act or a Company registered under Section 8 of the Companies Act 2013; or
- c) Through its CSR Co-ordinators

Sharekhan, with the help of BNP Paribas India Foundation, shall formulate criteria and procedure for selection, screening and due diligence of its implementing partners.

### **Monitoring**

Sharekhan shall institute a monitoring and review mechanism to monitor its CSR project/programmes. The monitoring mechanisms shall include:

1. Clear targets, timelines and measurable indicators, wherever possible.

2. A progress monitoring and reporting framework that is aligned with the requirements of Section 135 of the Companies Act 2013 and the CSR Rules.

### **Reporting**

Sharekhan shall monitor progress of CSR projects and report to the Board of Directors and the CSR Committee once in every quarter. The Company will report CSR performance in its annual report as per the structure and format prescribed in the notified CSR Rules.

### **Validity of CSR Policy**

Any modification/amendment in the CSR Policy shall be carried out by the CSR Committee with the prior approval of the Board of Directors of Sharekhan.