

UFO MOVIEZ INDIA LIMITED

Regd. Office: Valuable Techno Park, Plot #53/1, Road #7, MIDC, Marol, Andheri (E), Mumbai – 400093
Tel: +91 22 40305060 Fax: +91 22 40305110; Email: corporate@ufomoviez.com
Website: www.ufomoviez.com; CIN: L22120MH2004PLC285453

CORPORATE SOCIAL RESPONSIBILITY POLICY

Document History:

Date of Board Approval	Effective Date	Summary
27 th March, 2015	27 th March, 2015	The Corporate Social Responsibility Policy (CSR) adopted by the Board as recommended by the CSR Committee.
23 rd July, 2015	23 rd July, 2015	Amendment in Thrust Areas clause of the CSR Policy.
27 th March, 2021	27 th March, 2021	Amendments pursuant to the notification of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 and amendment in section 135 of the Companies Act, 2013.

UFO MOVIEZ INDIA LIMITED

Regd. Office: Valuable Techno Park, Plot #53/1, Road #7, MIDC, Marol, Andheri (E), Mumbai – 400093
Tel: +91 22 40305060 Fax: +91 22 40305110; Email: corporate@ufomoviez.com
Website: www.ufomoviez.com; CIN: L22120MH2004PLC285453

CORPORATE SOCIAL RESPONSIBILITY POLICY

1) CSR Policy & Philosophy

UFO Moviez India Limited is committed to operate and grow its business in a socially responsible way with a vision to be an environment friendly corporate citizen. UFO Moviez India Limited has taken up various corporate social responsibility initiatives earlier and will continue to do so in future.

Constitution of a corporate social responsibility committee of the board of directors and formulation of a corporate social responsibility policy has become mandatory for UFO Moviez India Limited under Section 135 of the Act (as defined below). Accordingly, the Board (as defined below) has constituted a CSR Committee (as defined below). The CSR Committee has formulated, modified and recommended to the Board the CSR Policy (as defined below) from time to time which encompasses its philosophy and guides its sustained efforts for undertaking and supporting socially useful programs.

2) CSR Vision

Improve quality of life for all our communities through integrated and sustainable development in every possible way.

3) Definitions

In this CSR Policy, unless the context otherwise requires;

- a) **“Act”** shall mean the Companies Act, 2013, including any modifications, amendments or re-enactment thereof.
- b) **“Administrative overheads”** means the expenses incurred by the company for ‘general management and administration’ of Corporate Social Responsibility functions in the company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme;
- c) **“Agency” or “Agencies”** shall mean:
 - i. a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company, or
 - ii. a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
 - iii. any entity established under an Act of Parliament or a State legislature; or
 - iv. a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

Every entity mentioned above, who intends to undertake any CSR activity, shall register itself with the Central Government by filing the form CSR-1 electronically with the Registrar, with effect from 1st April, 2021.

- d) **“Annual Action Plan”** shall mean the annual plan with respect to the list of approved CSR projects / programmes to be undertaken by the Company, their manner of execution, modalities of utilization of funds, implementation schedule, monitoring and reporting mechanism for the projects or programmes and details of need and impact assessment, if any, for the projects undertaken by the company, as approved by the Board on the recommendation of the CSR Committee in accordance with the provisions of the Act and Rules as amended from time to time, for a particular Financial Year.
- e) **“Approved Budget”** shall mean the total budget as approved by the Board of the Company which is to be spent or utilized for CSR Activities.
- f) **“Average Net Profits”** shall mean the average net profits of the Company as defined under the Act and the Rules based on which a specific percentage for CSR Expenditure has to be calculated.
- g) **“Board”** shall mean the Board of Directors of the Company.
- h) **“Company”** shall mean UFO Moviez India Limited.
- i) **“CSR Activities”** shall mean all the Corporate Social Responsibility activities / programmes / initiatives of the Company, either ongoing of over one year or projects completed within the financial year, undertaken directly by the Company or through Agencies, in conformity with the Act, Rules made thereunder and with the activities specified in Schedule VII to the Act (as amended from time to time) in and around the registered office, corporate office, sales offices, warehouses of the Company, its subsidiaries and associates wherever located, as recommended by the CSR Committee and approved by the Board.
- j) **“CSR Committee”** shall mean the Corporate Social Responsibility Committee as constituted by the Board in accordance with the Act and the Rules, comprising of three or more Directors, out of which, at least one director shall be an independent director.
- k) **“CSR Expenditure”** shall mean all expenditure on CSR Activities as recommended by the CSR Committee and approved by the Board.
- l) **“CSR Project Implementation Group”** shall mean a group of officers of the Company or Group Companies formed by the Company to assist the CSR Committee to implement the CSR Activities envisaged under the CSR Policy.
- m) **“CSR Policy”** shall mean corporate social responsibility policy of the Company approved by the board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan.
- n) **“Financial Year”** shall mean the period beginning from April 1 of every year to March 31 of the succeeding year.
- o) **“Group Companies”** shall mean holding companies, subsidiaries and associate companies of the Company.

- p) **“Ongoing Project”** means a multi-year project undertaken by a Company in fulfillment of its CSR obligation having timelines not exceeding three 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.
- q) **“Rules”** shall mean the Companies (Corporate Social Responsibility Policy) Rules, 2014 read with Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, including any modifications, amendments or re-enactment thereof.
- r) **“Thrust Areas”** shall mean the areas or activities described as such in the CSR Policy, as amended by the CSR Committee, from time to time.
- s) **“Trust”** shall mean a trust formed and registered under the Indian Trust Act, 1882 and under the Income Tax Act, 1961 for those states where registration of trust is not mandatory.

Words and expressions used and not defined in this CSR Policy shall have the same meanings respectively assigned to them in the Act and / or the Rules.

4) **Functions of the CSR Committee**

In terms of the Act, the CSR Committee is required to, *inter alia*, carry out the following functions:

- (a) formulate/modify and recommend to the Board from time to time, a CSR Policy which shall indicate the activities to be undertaken by UFO Moviez India Limited as specified in Schedule VII of the Act and include guiding principles for selection, implementation and monitoring of CSR activities;
- (b) recommend the amount of expenditure to be incurred on the activities referred to in subparagraph (a);
- (c) monitor the CSR Policy from time to time; and
- (d) Formulate / modify and recommend to the Board, annual action plan in pursuance of this CSR policy of the Company which shall specify the details as per the Rules (as defined below) as may be amended from time to time.

5) **Thrust Areas**

While the Company strives to undertake all or any suitable activity as specified in Schedule VII to the Act, currently, we focus to support and implement the following activities as our Thrust Areas:

- a) 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;
- b) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;

- c) 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;
- d) 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 setup by the Central Government for rejuvenation of river Ganga;
- e) 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;
- f) measures for the benefit of armed forces veterans, Central Armed Police forces and Central Para Military Forces veterans and their dependents including widows;
- g) training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
- h) contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM Cares Fund) any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;
- i) contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government or State Government;
- j) rural development projects;
- k) slum area development;
- l) disaster management, including relief, rehabilitation and reconstruction activities;
- m) Promotion of any activities relating to any of the forgoing thrust areas, of any of the departments of:
 - (a) the Central Government, or
 - (b) any of the State Governments, or
 - (c) any of the Union Territories of India, or
 - (d) any other eligible trustsprovided such promotion is certified by such government or trust to be under the Corporate Social Responsibility (CSR)."
- n) any such other activities or programs as may be included / amended under the Schedule of the Act and Rules from time to time

6) Implementation

- a) The CSR Committee will identify the CSR Activities, formulate and recommend to the Board an annual action plan in pursuance of this Policy, the Act and the Rules.
- b) The CSR Activities will be carried out in and around the registered office, corporate office, sales offices / warehouses of the Company and its Group Companies. However, this shall not bar the Company from pursuing its CSR Activities in any other areas in accordance with the Act and the Rules.
- c) The CSR Activities will be carried out / implemented either directly by the Company itself or, through agency / agencies established / registered to carry on the CSR Activities as defined under this Policy and in accordance with the Rules and any circular issued by the Ministry of Corporate Affairs.
- d) The Company may engage any international organizations for carrying out its CSR Activities or may collaborate with other companies for undertaking CSR Activities in the manner specified under the Rules.

- e) The CSR Project Implementation Group shall be responsible for overall execution of the Project within the broad guidelines / principles set out by the CSR Committee / as approved by the Board from time to time and periodic reporting of the same to the CSR Committee.

7) Expenditure not covered or recognized

The following contributions shall not be considered as CSR Expenditure;

- a) Contributions of any amount, whether directly or indirectly, to any political party or any person associated with a political party.
- b) Amount spent, whether directly or indirectly, for the benefit of employees of the Company, its Group Companies and their families.
- c) Expenses incurred by the Company for the fulfillment of obligations under any act / statute or regulations (such as labour laws).
- d) Expenses incurred by the Company for one off events such as marathons / awards / charitable contribution / advertisement / sponsorships of TV programs etc.
- e) Expenses incurred by the Company for activities undertaken in pursuance of its normal course of business.
- f) Expenses incurred by the Company on 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.
- g) Other contributions / expenses not recognized under the Act / Rules as Amended or modified, from time to time.

8) Funding and allocation

Following is the mode of funding and allocation of area-wise planned expenditure for the CSR Activities

- a) The Company shall, in every Financial Year, contribute a statutory minimum limit of at least two per cent (2%) of its Average Net Profits made during three immediately preceding Financial Years for the CSR Expenditure.
- b) The Company may set-off the excess amount of its CSR expenditure spent in any Financial Year against the requirement of CSR expenditure to spend up to immediate succeeding three Financial Years in accordance with the Act and the Rules.
- c) Any surplus arising out of CSR Activities undertaken by the Company shall not form part of the business profits of the Company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spend in the CSR Activities as per the Annual Action Plan of the Company or shall be transferred to the Fund (as specified in Schedule VII of the Act) in accordance with and in the manner prescribed under provisions of the Act and the Rules.
- d) The administrative overheads for carrying out the CSR activities shall not exceed five percent of total CSR expenditure of the Company for the financial year.
- e) Pursuant to an ongoing project, any amount remaining unspent in a financial year would be transferred within a period of thirty days from the end of the financial year to the Unspent CSR Account and such amount will be spent within a period of three financial years towards the project.

In the event the amount is not spent, it will be transferred to a fund specified in Schedule VII of the Act within 30 days from the date of completion of the third financial year.

- f) Pursuant to CSR spending on other than on-going projects, any amount remaining unspent in a financial year would be transferred to a fund specified in Schedule VII of the Act within six months of the end of the financial year.

9) Monitoring mechanism

- a) The CSR Project Implementation Group of the Company will coordinate / review the implementation of CSR Activities at various areas and report to the Board through the CSR Committee from time to time.
- b) The CSR Committee shall meet at least once in a year to monitor the implementation of the CSR Policy and the CSR Activities.
- c) The CSR Committee shall on an annual basis place before the Board, for its approval the annual report on CSR Activities as per the format specified under paragraph 10 below. The Board shall include in its report to the shareholders, the annual report on CSR Activities as per the format specified under the Rules.
- d) The Board shall satisfy itself that the funds so disbursed have been utilised for the purposes and in the manner as approved by it and the Chief Financial Officer shall certify to the effect.
- e) In case of ongoing projects, the Board shall monitor the implementation of the project with reference to the approved timelines and year-wise allocation and shall make modification, if required for smooth implementation of the project.
- f) The company secretary of the Company shall act as the Secretary of the CSR Committee.

10) Reporting format

The Company shall disclose the CSR Policy and the projects approved by the Board of Directors for the financial year on its website.

An Annual CSR Report will be included in the Directors Report of the Company as per the prescribed format and requirements of section 135 of the Act and Rules framed there under as amended from time to time.
