

WALL STREET FINANCE LIMITED
CORPORATE SOCIAL RESPONSIBILITY (CSR)
VERSION - 1

Prepared	Recommended
Sd/-	Sd/-
Chaitali Desai	Arun Ajmera
Company Secretary	Chief Executive Officer
Version -1	Approved by the Board of Directors on 28 th March, 2016

INTRODUCTION

The Board of Directors of Wall Street Finance Limited ('the Board') has adopted this Policy upon the recommendation of the Corporate Social Responsibility Committee (the 'CSR Committee') in terms of Section 135 of the Companies Act, 2013 (the 'Act') and rules framed thereunder.

CORPORATE SOCIAL RESPONSIBILITY (CSR) PHILOSOPHY

We believe that to succeed an organization must maintain highest standards of corporate behavior towards the society in which it operates. We believe that integrating social, educational, environmental and ethical responsibilities into the governance of businesses ensures their long term success and sustainability.

POLICY OBJECTIVE

The main objective of this Policy is to lay down guidelines for the Company to make CSR a key business process for sustainable development for the society and establish a framework for ensuring compliance with the applicable laws.

CONSTITUTION OF CSR COMMITTEE

Pursuant to Section 135 of the Act and rules framed thereunder, the Board of Directors of the Company has constituted a Corporate Social Responsibility Committee comprising of the following Board of Directors:

- (a) Ms. Preeti Malhotra
- (b) Mr. Brij Gopal Daga
- (c) Mr. Sudip Bandyopadhyay

The CSR Committee shall carry out the following functions :

- (a) To formulate and recommend to the Board, a CSR policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013 and the rules made thereunder.
- (b) To review and recommend the amount of expenditure to be incurred on the activities to be undertaken by the Company.
- (c) To monitor the CSR policy of the Company from time to time.

Prepared	Recommended
Sd/-	Sd/-
Chaitali Desai	Arun Ajmera
Company Secretary	Chief Executive Officer
Version -1	Approved by the Board of Directors on 28 th March, 2016

- (d) To consider such other matters as considered appropriate by it or referred to it by the Board and/or enforced by any statutory notification, amendment or modification, as may be applicable, necessary or appropriate for performance of its duties.

THRUST AREA

The Company shall give thrust to the area(s), where the Company has its presence.

CSR ACTIVITIES

The Company shall presently undertake any one or more of the following activities as prescribed under Schedule VII of the Act and rules framed thereunder:

- (a) Eradicating hunger, poverty and malnutrition, promoting preventive health care and 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 centres 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, agro forestry, conservation of natural resources and maintaining quality of soil, air and water.
- (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, war widows and their dependents.
- (g) Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports.

Prepared	Recommended
Sd/-	Sd/-
Chaitali Desai	Arun Ajmera
Company Secretary	Chief Executive Officer
Version -1	Approved by the Board of Directors on 28 th March, 2016

- (h) 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 Scheduled Caste, 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 Govt.
- (j) Rural development projects.
- (k) Slum area development.

The CSR activities shall be undertaken by the Company as projects, programs or activities (either new or ongoing) excluding activities undertaken in pursuance of the normal course of business of the Company. The CSR projects or programs or activities that benefit only the employees of the Company and their families and contribution of any amount (directly or indirectly) to any political party, shall not be considered as CSR activities under this CSR Policy.

IMPLEMENTATION THROUGH COLLABORATIVE PARTNERSHIPS

The Company can form collaborative partnerships with the Government, the District Authorities, the village panchayats, NGOs in carrying out its CSR Programs. The Company may undertake CSR Programs through a registered trust or a registered society or a company established under Section 8 of the Act by the Company, either singly or along with its holding or subsidiary or associate company, or along with any other company or holding or subsidiary or associate company of such other company or otherwise.

The Company may also collaborate with a trust, society or company, other than those mentioned above for undertaking its CSR projects or programs, provided that the trust, society or company has an established track record of three years in undertaking similar programs or projects.

FUND ALLOCATION

The Company will, on annual basis, allocate at least 2% of the average net profits of the Company made during the three immediately preceding financial years, for the CSR activities. The average net profits for this purpose shall be computed in accordance with the applicable provisions of the Act read with the Rules made thereunder.

Prepared	Recommended
Sd/-	Sd/-
Chaitali Desai	Arun Ajmera
Company Secretary	Chief Executive Officer
Version -1	Approved by the Board of Directors on 28 th March, 2016

CSR Committee will recommend the annual budgeted expenditure to the Board for its consideration and approval.

All reasonable efforts shall be made to ensure that the annual CSR allocation is fully utilized in the respective year. However, if the Company fails to spend such amount, the Board shall, its report under Section 134 of the Companies Act, 2013, specify the reason for not spending the amount.

MONITORING

The CSR Committee will monitor the programs and projects to ensure that they are being carried out in compliance with this Policy and the Act and in accordance with the approved budget. Money expended towards CSR shall be released only against verification of utilization of funds as per approved work-plans and timelines. Verification may be done through review of documents, field visits and through an active feedback mechanism. In the event it is observed that any CSR activity taken up is not being implemented in the desired manner, the CSR Committee may, with the approval of the Board, discontinue funding of such project at any time during the course of implementation and deploy such funds for any other project/ activity or program.

REPORTING

The CSR Committee shall prepare an annual report on CSR, in the format prescribed under the Act and the Rules made thereunder and such report shall be included in the Board's report annexed to the financial statements. The report shall be signed by the Chairman of the CSR Committee and the CEO/ Director of the Company.

AMENDMENTS

Further, amendments in the statutory provisions shall be binding even if not incorporated in this Policy.

The Board of Directors of the Company may review and amend this Policy from time to time on recommendation of the CSR Committee.

DISCLOSURE

The contents of this Policy shall be displayed on the website of the Company www.wallstreetfinanceltd.com

This policy is approved by Board of Directors of company but the implementation will be done subject to the applicability of CSR rules on the Company.

Prepared	Recommended
Sd/-	Sd/-
Chaitali Desai	Arun Ajmera
Company Secretary	Chief Executive Officer
Version -1	Approved by the Board of Directors on 28 th March, 2016