

FIRST STEPS BABYWEAR PRIVATE LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY

1. INTRODUCTION:

Corporate Social Responsibility (CSR) at our company goes beyond business and extends to the implementation of socially relevant activities for the benefits of society at large.

This policy is in keeping with the requirements of the Companies Act 2013 and Companies (Corporate Social Responsibility Policy) Rules 2014.

2. VISION AND POLICY STATEMENT:

Corporate Social Responsibility (CSR) is the Company's contribution to social and economic development of the local community in which we operate and to society at large. We commit to spend a minimum of 2% of the average net profits for the preceding three financial years on CSR activities. The Board of Directors of the Company through its CSR Committee will plan and monitor the expenditure of CSR activities.

The CSR Committee will annually recommend the CSR programmes and projects to the Board for its approval. The activities undertaken in the normal course of business will not be a part of CSR activities.

3. APPLICABILITY:

This CSR Policy has been formulated in consonance with Section 135 of the Companies Act, 2013 read with the CSR rules notified by the Ministry of Corporate Affairs, Government of India. This policy shall apply to all CSR Projects / Programmes undertaken by the Company, First Steps babywear Private Limited, in India as per Schedule VII of the Companies Act, 2013.

4. CSR BUDGET:

The CSR Committee will recommend the annual budgeted expenditure project-wise to the board for its consideration and approval.

5. CSR PROGRAMMES AND PROJECTS:

The Company's commitment to CSR projects and programmes will be by investing resources into any of the following areas:

- Improving the quality of life in rural areas;
- Eradicating hunger, poverty and malnutrition;
- Promoting healthcare including preventive healthcare;

- Employment enhancing vocational skills;
- Promotion of education including investment in technology in schools;
- Ensuring environmental sustainability including measures for reducing inequalities faced by socially and economically backward groups;
- Promoting Sports including rural and Olympic Sports;
- Contribution to funds for promoting technology;
- Investing in various rural development projects;
- Contributing to the Prime Minister's National Relief Fund or any other fund setup by the Central Government for development and relief; and
- Other areas approved by CSR Committee that are covered in the CSR Rules as amended from time to time.

The Company's CSR projects and programmes will be implemented either by itself or through such agency as determined by CSR Committee.

6. CSR COMMITTEE:

➤ COMPOSITION:

- In compliance with the rules laid down under the Companies Act, 2013, the composition of the CSR Committee of the Company shall be as under:
 - Initially, the CSR Committee of the Board of Directors will comprise two Directors;
 - The Chairperson shall be the Managing Director.

➤ ROLES AND RESPONSIBILITIES:

The Committee shall

- Decide the CSR activities to be taken up by the Company in accordance with this policy;
- Decide the amount to be allocated for each project or activity;

- Oversee and monitor the progress of the initiatives rolled out under this policy; and
- Submit a report to the Board of Directors on all CSR activities undertaken during the financial year.

➤ **FREQUENCY OF MEETINGS:**

The Committee shall meet at least twice in a financial year.

7. REPORTING, EVALUATION AND DOCUMENTATION:

- The Budget for CSR initiatives shall be prepared in accordance with Section 135 of the Companies Act, 2013 or other statutory enactments.
- CSR Projects will be undertaken on the recommendations of the CSR Committee within the defined thrust areas.
- Project support will depend on the scale of the project and its feasibility. The CSR Committee will evaluate the project progress.
- The CSR Report shall also be included in the Board's Report as required by the Companies Act, 2013.
- Surplus arising out of CSR activity, if any, will not form part of business profit of the Company.
- The corpus of the CSR policy would include:
 - 2 % of the average net profits.
 - Any income arising therefrom.
 - Surplus arising out of the above activities.
- All CSR activities covered under this policy shall be carried out within India.

8. REVIEW OF THE POLICY:

The CSR Committee shall review the CSR policy annually and make revisions to the same with the approval of the Board.

Sd/-

CHAIRMAN, CSR COMMITTEE

Composition of CSR Committee:

1. Mr. Manish Pasi - Chairman
2. Mrs. Anjana Pasi - Member
3. Mr. Balasubramaniam Senthilnathan – Member

Sd-
CHAIRMAN, CSR COMMITTEE