



**CAPITAL TRADE**

**LINKS LTD.**

**CIN :L51909DL1984PLC019622**

# **CAPITAL TRADE LINKS LIMITED**

## **CSR POLICY**

**Effective Date – February 07,2025**



**CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY**  
**OF**  
**CAPITAL TRADE LINKS LIMITED (CTL)**

**(1) Preamble:**

Corporate Social Responsibility ("CSR") is the Company's commitment to its stakeholders to conduct business in an economically, socially and environmentally sustainable manner that is transparent and ethical.

Corporate Social Responsibility Policy has been developed in accordance with section 135 of the Companies Act, 2013(Act) and the Companies (Corporate social Responsibility) Rules, 2014 Notified by the Ministry of Corporate Affairs, Government of India.

**(2) Introduction:**

(a)Capital Trade Links Limited, (herein after referred to as "CTL") is an organization providing monetary advantage to individuals and organizations which are in need of finance.

(b) The money is advanced for both personal and commercial purpose. Instead of borrowing funds from bank, we generate funds from market financial resources. The company has established its own standards and norms for evaluating different needs of its clients and always provides suitable payment option considering no harm to its customers.

(c)The Company is having a vision to be a leader and role model in a broad based and integrated financial services business. Aims to be known for its financial services delivered to its clients. We are working to give hardcore service satisfaction by establishing utmost good faith in our relations by reaping maximum benefits for us and delivering it to its clients.

**(3) Focus areas:**

CTL CSR targets inclusive growth of all stakeholders under the following categories mentioned in schedule VII of the Companies Act, 2013 as under:

- (a) Education, including consumer education.
- (b) Environment and wild life protection
- (c) Promotion of sports and youth empowerment
- (d) Promoting of health care awareness among rural people.
- (e) Welfare of SC/ST and other back ward class and minorities

Any other additional item under schedule VII of the Companies Act, 2013 as may be prescribed from time to time.

**(4) Roles & Responsibilities:****CSR COMMITTEE:**

The committee shall consist of three or more directors of which at least one shall be an independent director. The following are the roles and responsibilities of the Committee:

- (a) Formulate and recommend CSR Policy to the Board
- (b) Identify key initiative pursuant to the CSR policy
- (c) Recommend the CSR expenditure to be incurred
- (d) Recommend modifications to CSR policy as and when required.

**BOARD OF DIRECTORS:**

The following are the roles and responsibilities of the Board of Directors of the Company:

- i. Approve the CSR Policy and take note of CSR expenditures on periodic bases.
- ii. Ensure the CSR spending in every financial year of at least 2% of average net profits made during immediately preceding 3 financial years, in pursuance with the CSR Policy.
- iii. Ensure that CSR activities included in the CSR Policy are undertaken by the Company and that such activities are related to the activities specified in Schedule VII of the Act.
- iv. Ensure disclosure of the contents of the CSR Policy on the Company's website.
- v. Ensure disclosure in the Directors' report pertaining to the following:
  - a) Contents of the CSR policy and constitution of the CSR Committee;
  - b) An annual report on the CSR in the prescribed format as per Annexure A of this CSR Policy;
  - c) Reasons for failure (if any) to spend required amount on CSR activities.
- vi. Authorize executives of the Company to attend the CSR Committee meetings.

**(5) Implementation:**

The CSR Activities may be undertaken by the Company directly through its Implementation Group or with the prior approval of the Board, through any of the following entities as **"Implementation Agency"** being duly registered with the Central Government and having a unique CSR Registration Number (with effect from 1 April 2021):

- (i) Company established under section 8 of Indian Companies Act 2013, or Trust, or Society registered under section 12-A and 80-G of the Income Tax Act 1961, being established by the Company, either singly or along with any other company;
- (ii) Company established under section 8 of Indian Companies Act 2013, or Trust, or Society, being established by (Indian) Central Government or (Indian) State Government;
- (iii) Company established under section 8 of Indian Companies Act 2013, or Trust, or Society registered under section 12-A and 80-G of the (Indian) Income Tax Act 1961, and having an established track record of at least three years in undertaking similar CSR activities; or



(iv) Any entity established under an act of (Indian) Parliament or a (Indian) State Legislature.

In case of failure to ensure the minimum CSR Expenditure i.e. 2% (two percent) of average Net Profits of the Company made during the three immediately preceding financial years, detailed reasons for the same should be submitted by the Implementation Group to the CSR Committee and the Board. Further the Board shall duly include such explanation in their annual board of directors' report.

**(6) Governance:**

(a) Every year, a CSR Plan delineates the CSR Programmes to be carried out during the financial year and the specified budgets thereof. The Board will consider and approve the CSR Plan with any modification that may be deemed necessary.

(b) The persons/bodies to which the implementation is assigned shall carry out such CSR Programmes as determined by the Board within the specified budget and timeframes and report back to the Board on the progress thereon at such frequency as the Board may direct.

(c) The Board shall review the implementation of the CSR Programmes on regular basis and issue necessary directions from time to time to ensure orderly and efficient execution of the CSR Programmes in accordance with this Policy.

(d) At the end of every financial year, the Board shall make a report.

**(7) Limitation, Review and Amendment:**

In the event of any conflict between the provisions of this Policy and of the Applicable Law, the provisions of Applicable Law shall prevail over this Policy. Any subsequent amendment / modification to the Applicable Law shall automatically apply to this Policy.

The Board may review this Policy periodically and recommend amendments from time to time, as may be deemed necessary.