

Corporate Social Responsibility (CSR)  
Policy guidelines of WAM INDIA PVT LTD  
as specified under Companies Act 2013

# CSR POLICY

WAM INDIA PVT LTD

2019

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## Corporate Social Responsibility (CSR) POLICY

### 1) Introduction

WAM India Private Limited (“the Company”), is a wholly owned subsidiary of the Italian WAMGROUP S.p.A., engaged in developing and manufacturing equipment and plant components for bulk solids handling and processing, since 1998. The Company is responsible for distribution of the WAMGROUP product range in India, Sri Lanka, Bangladesh and Nepal. Further, the Company is the Group’s manufacturing hub for the subcontinent.

The Company provides its customers with products in industrial quality, specifically tailored to the different needs of a variety of industries. Customer satisfaction through professional advice, comprehensive service and constant availability backed up by a vast stock of equipment and spare parts are an expectation WAM India is ready to fulfil day by day.

### 2) Objectives

The objective of this Policy is threefold.

- i. Establish a guideline for compliance with the provisions of the Act and Rules related to CSR,
- ii. Implement CSR initiatives in both letter and spirit through appropriate procedures and reporting, and
- iii. Initiate projects that benefit the community at large.

### 3) Scope & Applicability

The provisions related to CSR are incorporated under Section 135 of Companies Act, 2013 (the Act) read with Schedule VII to the Act and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (the Rules) and amendments thereunder time to time along with General Circular No. 21/2014 w.r.t. Clarification with regard to provisions of Corporate Social Responsibility under section 135 of the Companies Act, 2013.

This Policy has been formulated under the above provisions of the Act and shall be applicable to all CSR initiatives and activities undertaken by the Company, for the benefit of different segments of society.

This policy and the functioning of CSR committee shall be guided by Values and code of Ethics of WAMGROUP to the extent it is not contradictory to the Indian Laws. In case of contradictions Indian Law will prevail.

### 4) CSR Committee

The CSR Committee consist of all the Directors of the Company, viz;

- i. Mr. Vainer Marchesini
- ii. Mr. Roberto Marchesini
- iii. Mr. Marcello Marchesini
- iv. Mr. Luigi Bordonaro

The Committee shall meet, whenever required, to discuss and review CSR activities and Policy. Quorum for the CSR Committee Meeting shall be one-third of its total strength (any fraction contained in that one-third be rounded off as one) or two members, whichever is higher.

The Committee members may attend the meeting physically or via such audiovisual means as permitted under the Act. The Committee shall have the authority to invite such employee(s), senior official(s) and or externals experts, as it may deem fit, to attend the CSR Committee Meeting(s).

## **5) Responsibilities of the CSR Committee**

Functions/ responsibilities of the CSR Committee as mentioned in sub-section (3) of Sec.135 of the Companies Act, 2013

- i. To formulate and recommend to the Board, a CSR Policy which shall indicate the activities to be undertaken by the Company as per the Act;
- ii. To recommend CSR activity / programme / project to the Board for its approval;
- iii. To review and recommend the amount of expenditure to be incurred on the activities to be undertaken by the Company;
- iv. To monitor the CSR Policy of the Company from time to time;
- v. To review the CSR activities of the Company and provide progress update to the Board of Directors at such interval as may be deemed fit.
- vi. Any other matter as the CSR Committee may deem appropriate after approval of the Board of Directors or as may be directed by the Board of Directors, from time to time.

## **6) CSR ACTIVITIES / PROGRAMMES / PROJECTS:**

The Policy recognizes that corporate social responsibility is not merely compliance; it is a commitment to support initiatives that measurably improve the lives of underprivileged section of the society by one or more of the focus areas as outlined in this para.

The CSR Committee shall consider and approve (in line with the guidelines given below), CSR activities / programmes / projects to be undertaken during the year.

- i. To ensure that the CSR activity / programmes / project is not discriminatory in nature;
- ii. The CSR activities be implemented within India and preferably in the areas where the Company has its presence;
- iii. Programmes / projects that integrate business models with social and environmental priorities and process in order to create shared value shall be encouraged;

- iv. CSR activity/ programme /project should not exclusively for the benefit of employees of the Company or their family members or those that are conducted /undertaken exclusively in pursuance to the normal course of business of the Company;
- v. Any surplus generated from CSR activity of the Company, will be plough back to the CSR initiatives of the Company.

This Policy will serve as guiding document to help identify, execute and monitor CSR projects in keeping with the spirit of the Policy.

#### **Implementation:**

The Company shall undertake CSR Projects which are closely linked with the principles of sustainable development and shared, with involvement of local institutions and the community at large.

The CSR Core Team as may be constituted by CSR Committee would assist in implementation and monitoring of the CSR projects / initiatives. The actual implementation of various initiatives would be broad-based with the involvement of various employees/units or through implementing agencies like NGOs, Trusts, Societies, Section 8 / Section 25 companies or through collaborative projects with other corporate.

#### **Disbursement:**

The disbursement of funds for CSR activity / programme / project will be in one or more tranche depending upon the nature and requirement of project. The terms, conditions and timing of disbursement will be with the approval of CSR Committee after due discussion with the CSR Core Team.

#### **Focus Area of CSR Activities / Programmes / Projects**

- i. Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the central government for the promotion of sanitation and making available safe drinking water, reducing child mortality and improving maternal health.
- ii. Promoting education, including special education and employment enhancing vocational skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects, social business projects;
- iii. Promoting gender equality, empowering women, setting up homes and hotels 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;
- iv. 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 set-up by the Central Government for rejuvenation of river Ganga;
- v. 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;
  - vi. Measures for the benefit of armed forces veterans, war widows and their dependents;
  - vii. Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
  - viii. Combating human immune deficiency virus, acquired immune deficiency syndrome, malaria and other diseases
  - ix. Contribution to Prime Minister's National Relief Fund or any other fund set up by the Central/State Government for socio-economic development and relief and welfare of the Schedule Castes, the Scheduled Tribes, other backward classes, minorities and women;
  - x. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
  - xi. Any other activities / programmes / projects as may be decided from time to time.

## **7) AMENDMENTS / MODIFICATION TO THE POLICY:**

The Board of Directors on its own and/or as per the recommendations of CSR Committee can amend this Policy, as and when required or deemed fit. The provisions of this CSR Policy would be subject to revision/amendment in accordance with the provisions of the Act, as may be issued from relevant statutory authorities, from time to time.