



CSR Policy

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1. PREAMBLE:

Corporate Social Responsibility (CSR) is not merely compliance but a social investment to help sustainability of society. It is a commitment to support initiatives that measurably improve the lives of under-privileged by addressing their needs.

Being the largest and the oldest commercial institution in the union territories of J&K and Ladakh, the Jammu & Kashmir Bank Ltd has adopted Corporate Social Responsibility as a considered means for sustainable growth and believes that CSR is a way of going beyond business objectives for strengthening shared value and contributing to social good.

2. PURPOSE:

J&K Bank is committed to identifying and supporting CSR programmes aimed at developing and advancing the communities particularly the people belonging to marginalized and other weaker sections of society.

The Policy Document shall also serve as a guiding document to help identify, execute and monitor CSR Programmes besides, functioning as a self-regulating mechanism for the Bank's CSR activities and enable adherence to all regulatory standards including Indian Companies Act, 2013.

3. POLICY STATEMENT & VISION:

In alignment with its vision, the bank as a socially responsible corporate citizen, shall continue to enhance value creation in the society and the community through its CSR activities, which ultimately would promote sustained growth in the society. The main objective of the CSR Policy shall be to showcase the Bank's continuous commitment to participate in economically, socially and environmentally sustainable activities for upliftment of the marginalized and under-privileged sections of the society to promote inclusive socio- economic wellbeing and growth, empowerment of communities, capacity building, environment protection, promotion of green environment, development of backward regions by specially focusing on the projects relating to the benefit of the marginalized sections of the society. However the local area would be given preference for CSR activities.

4. SCOPE:

This Policy is in line with the CSR objectives as outlined under Section 135 of the Companies Act 2013. It shall be applicable to all the Projects /programmes undertaken as part of the Bank's Corporate Social Responsibility activities in compliance to the directions issued by the Ministry of Corporate Affairs and other regulatory authorities.

5. GOVERNANCE:

The Corporate Social Responsibility Department shall be responsible for administering and executing the duly approved projects by the Bank's CSR committee/Board. However, the overall approving and governance of the CSR Policy framework shall be the responsibility of the CSR Committee of the Board. The Policy may be revised in accordance with the changes evolving from time to time in the CSR rules & regulations. The Bank's Board of Directors shall, after taking into account the recommendations of CSR Committee, approve the CSR Policy and disclose its contents in its report and shall be displayed on the company's website.

6. CSR COMMITTEE OF THE BOARD:

The Committee shall comprise of minimum 3 directors of which one shall be an independent director.

7. CSR BUDGET:

The mandatory amount to be spent by the Bank shall be, as stipulated under the Indian Companies Act, as amended from time to time (presently 2% of the average net profits for the preceding three financial years) and as approved by the Board. Within the budgeted amount, specific and sustainable CSR initiatives /projects will be approved by the CSR Committee of the Board. The Bank shall have discretion to spend more than the given CSR budget in a particular financial year after proper internal approval from the Board.

Besides, the CSR Committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy, which shall focus on the following:-

- a. focus areas
- b. the manner of execution
- c. fund utilization modalities
- d. monitoring and reporting mechanism, and
- e. details of need of impact assessment, if any, for the projects undertaken by the company.

However, the Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

8. IMPLEMENTATION, SUPERVISION & MONITORING

The CSR programmes shall be undertaken by the Bank either directly or with the aid of specialized agencies which would include reputed NGOs, Trusts, Societies, Certified Incubation Centers or through Collaborative Projects with Other Corporates, Academic Institutions, Self-Help Groups, Govt. /Semi-Govt/Autonomous Organizations, etc.

The Bank's CSR activities will be driven by a dedicated CSR team under the guidance and support of senior functionaries of the CSR vertical including Vice President and President. The CSR Committee shall be the overall supervising and guiding authority to ensure CSR initiatives are implemented/ executed in line with both the desired objectives of the project and the CSR Policy of the Bank.

The Bank's CSR activities shall be reviewed on a quarterly basis by the CSR committee, for which review/ information notes will be submitted by the CSR Department giving full details of fund utilization, processes followed, payment procedures adopted, implementation timelines, inspection of works or any other relevant information cum utilization of each project/ work. However, the Bank may, with the approval of the CSR committee of the Board, constitute a cross departmental committee to supervise and monitor activities where project cost is INR One Crore or above.

9. REPORTING AND DISCLOSURE IN BANK'S ANNUAL REPORT:

CSR activities/ projects undertaken by the Bank and the achievements thereof will be reported as part of the Directors Report in the Bank's annual report in line with the format prescribed by the ministry of corporate Affairs, Government of India (as provided in Annexure II to this Policy).

10. CSR PROGRAMMES/ PROJECTS - Broad Guidelines:

Guided by the spirit and scope of the activities as enumerated in Schedule VII of the Companies Act 2013 (see Annexure I 'Areas of Intervention' for details) and other directions issued by the regulator/s from time to time, Bank will undertake CSR activities on the following broader guidelines:

- a. The programs/ projects will be beyond business as usual with no quid pro quo considerations. The Bank will ensure that its CSR projects are non-discriminatory in nature and do not have any restrictive political or religious aspects/ overtones.
- b. The programs/projects will be implemented pan India however, the local area would be given preference for CSR activities.

- c. Programs/ Projects that integrate business models with social and environmental priorities and processes in order to create shared value on sustainable basis. However, regulatory guidelines, for maintaining an arm's length distance between business activities of the bank and CSR activities/ projects, initiatives undertaken, will be ensured and monitored through inspections/ audit.
- d. Programs/Projects should NOT be exclusively for the benefit of employees of the Bank or their family members or those that are conducted /undertaken exclusively in pursuance of the normal course of banking business.

11. APPROVALS & FINANCIAL DELEGATION OF CSR EXPENDITURE

CSR activities identified/ proposed from time to time both at operational (branches) as well as at the Corporate Headquarters level of the Bank shall be placed before the CSR Committee of the Board for approval at periodic intervals (in case the projects proposed are beyond the delegated powers of different functionaries of CC&M Department / vertical and the Chairman/MD). To afford flexibility in approval of CSR programmes, the following financial delegation is proposed:

- a. **President CC&M:** Rs. 50000/= (Rupees Fifty Thousand) in each individual case, subject to annual ceiling of Rs. 20.00 Lakhs (Rupees Twenty Lakhs)
- b. **Executive Director:** Rs. 1.00 Lakh (Rupees One Lakh) in each individual case/project, subject to annual ceiling of Rs. 40.00 lakhs (Rupees Forty Lakhs)
- c. **MD & CEO:** Up to Rs. 25.00 Lakhs (Rupees Twenty Five Lakhs) in each individual case/project, subject to annual ceiling of Rs. 5.00 Crore(Rupees Five Crores)
- d. **CSR Committee of the Board:** From Rs. 25.00 Lakhs (Rupees Twenty Five Lakhs) onwards to 75 Lakhs (Rupees Twenty Five Lakhs) per Project, subject to annual ceiling of Rs. 20 Crore (Rupees Five Crores).
- e. **Board of Directors:** From Rs.75.00 Lakhs (Rupees Seventy Five Lakhs) onwards per project up to the Maximum extent of funds earmarked for CSR activities on annual basis.

Powers for recurring expenditure of already initiated/ undertaken approved CSR projects/ Works

Miscellaneous expenses up to Rs.5 Lac shall be within the powers of Vice President and up to Rs.10 Lac with the President CC&M/CSR Department. Miscellaneous expenditure will broadly cover logistic costs like freight, carriage & cooliage, Impact assessment audit (Third Party Social Audit) costs or any other related overheads of CSR projects undertaken by the Bank.

Maximum sectoral ceiling of CSR spending

For avoiding limited concentration of expenses on CSR projects/ sectors there shall be a maximum ceiling of 15% within the prescribed CSR Budget/ spend for a single activity /project and not more than 30% in a single segment (e.g. Healthcare/Education etc). Any deviation in this regard shall have to be authorized by the CSR Committee of the Board. Subsequently the Board of Directors shall ratify such proposals (usually at the end of the financial year).

12. TREATMENT OF UNSPENT CSR FUNDS

Any unspent amount of ongoing projects to be transferred in a special account called Unspent CSR Account within 30 days of the end of the financial year for use within a period of three financial years from the date of such transfer (with the balance unspent out of such account at the end of the three financial years to be transferred to a Fund specified in Schedule VII of the Companies Act 2013, within a period of thirty days from the date of completion of the third financial year); or transfer an unspent amount not relating to ongoing projects to such funds as mentioned in Schedule VII of the Companies Act 2013 within 6 months of the end of the financial year.

13. THIRD PARTY SOCIAL AUDIT:

In case the average CSR obligation is ten crore rupees or more in pursuance of sub-section(5) of section 135 of the Companies Act 2013, in the three immediately preceding financial years, the Bank shall undertake impact assessment, through an independent agency, of the CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.

The exercise will aim at measuring the desired positive changes and objective impact assessment of the initiatives taken under Corporate Social Responsibility of the Bank.

14. OWNERSHIP & REVIEW OF THE POLICY:

The ownership of the policy shall lie with the Corporate Communication & Marketing Department. CC&M Department shall be responsible for placing the policy review before the Board for approval and ensure timely review/updation/modification of the policy.

The policy shall be reviewed after every two years with a clause for midterm review in case of any major amendments in the regulatory norms/ rules governing CSR. However, minor changes like changes in nomenclature or composition of the CSR Committee of the Board will be affected with the approval of the CMD.

Annexures

Annexure I - Areas of Intervention

Bank will implement CSR projects/ programmes in line with the broader set of activities as outlined by MCA under Schedule VII of the Indian Companies Act 2013 read with CSR Rules 2014. The statutory provision and provisions of CSR Rules, 2014, is to ensure that while activities undertaken in pursuance of the CSR policy must be relatable to Schedule VII of the Companies Act 2013, the entries in the said Schedule VII must be interpreted liberally so as to capture the essence of the subjects enumerated in the said Schedule. (Ref: Gen Circular No 21/2014, No 05/01/2014-CSR Issued by Government of India, Ministry of Corporate Affairs)

Accordingly, the referential areas of intervention are mentioned below:

1. Eradicating hunger, poverty and malnutrition promoting healthcare including preventive healthcare 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;
2. Promoting education , including Special education and employment enhancing vocation skills especially among children, women, elderly and differently abled and livelihood enhancement projects;
3. 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;
4. 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;
5. 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;
6. Measures for the benefit of armed forces veterans, war widows and their dependents; Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
7. Training to promote rural sports, nationally recognized sports, para Olympic sports and Olympic sports;
8. Contribution to the Prime Minister's National Relief Fund or Prime Minister's Central Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or 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;

9. Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Biotechnology (DBT) , Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);
10. Rural Development Projects;
11. Slum Area Development*
12. Disaster management, including relief, rehabilitation and reconstruction activities.

*As per the explanation the term ‘Slum Area’ shall mean any area declared as such by the Central Government or any State Government or any other Competent Authority under any law for the time being in force.

a. Additional items covered under Schedule VII

In accordance with the clarification issued vide General Circular No 21/2014 dated 18.06.2014, J&K Bank CSR Policy shall also be covered under Schedule VII of the Companies Act 2013.

1. Educating the masses and promotion of Road safety awareness in all facets of road usage. (Covered under schedule VII(ii) under “Promoting Education”
2. Drivers Training (Covered under Schedule VII (ii) under ‘Vocational skills’
3. Safety Traffic Engineering and awareness through print, audio and visual media (covered under Schedule VII (ii) under “Promoting Education”
4. Giving Medical & Legal Aid , Treatment to road accident victims.(Covered under Schedule VII (i) under “Promoting healthcare including preventive healthcare”
5. Provisions for aids and appliances to the differently abled persons.(Covered under schedule VII(i) promoting healthcare including preventive healthcare”
6. Capacity building for farmers covering best sustainable farm management practices. (Covered under Schedule VII (ii) “Vocational Skills” livelihood enhancement Projects.
7. Training Agriculture labour on skill development (covered under Schedule VII(ii) under “Vocational Skill”
8. Doing our own research on the field for individual crops to find out the most cost optimum and Agri-ecological sustainable farm practices (Applied research) with a

- focus on Water Management. (Covered under Schedule VII (iv) under "Ecological Balance... maintaining quality of soil, air & water"
9. To do Product Life Cycle analysis from the soil conservation point of view (Covered under Schedule VII (iv) under "Conservation of natural resource" and "maintaining quality of soil, air & water"
 10. Providing effective consumer grievance redressal mechanism; protecting Consumers' health and safety, sustainable consumption, consumer service, support and complaint resolution; consumer protection activities; Consumer rights to be mandated; All consumer protection programmes and activities" on the same lines as rural development , education etc. (Covered Under Schedule VII (ii) under "Promoting education".
 11. Donation to IIMA for conservation of buildings and renovation of classrooms. (Covered under "promoting education")
 12. Non-Academic Techno park TBI not located within an academic institution but approved and supported by Department of Science & Technology.(covered under "promoting Education" if approved by Department of science & Technology)
 13. Disaster Relief: - Disaster relief shall cover wide range of activities that can be appropriately shown under various items listed in Schedule VII. For example
 - Medical Aid can be covered under "promoting Healthcare including preventive healthcare"
 - Food supply can be covered under "eradicating hunger, poverty & Mal nutrition"
 - Supply of clean water can be covered under "sanitation and making available safe drinking water".
 14. Trauma Care around highways in case of road accidents. (Covered under Schedule VII (I) under "Healthcare"
 15. Supplementing of Government schemes like Mid-day meal scheme by Corporates through additional nutrition.(Covered under Schedule VII (i) under poverty & malnutrition"
 16. Enabling access to, or , improving the delivery of Public Health System.(depending on the context, it shall be covered under both the Heads of Schedule VII "health care" or " measures for reducing inequalities faced by socially & economically backward
 17. Slum re-development or EWS Housing (Covered under " measures for reducing inequalities faced by socially & economically backward groups")
 18. Renewable energy products (Covered under Schedule VII ' environmental sustainability , ecological balance and conservation of natural resources'
 19. Contribution to any distress/disaster fund, created for rehabilitation of sufferers of natural calamities/disasters.
 20. Carry forward of unspent portion of the mandated amount to subsequent year in addition to the prescribed CSR expenditure of the succeeding year.

The statutory provision and provisions of CSR Rules, 2014, is to ensure that while activities undertaken in pursuance of the CSR policy must be relatable to Schedule VII of the Companies Act 2013, the entries in the said Schedule VII must be interpreted liberally so as to capture the essence of the subjects enumerated in the said Schedule.

b. J&K Bank's CSR Policy shall not include the following activities under CSR:

- 1) Training to enforcement personnel. (It is establishment functions of Government (cannot be covered).
- 2) Capacity building of government officials and elected representatives-both in the area of PPPs and urban infrastructure (not covered under Schedule VII).
- 3) Sustainable urban development and urban public transport systems (Not covered under Schedule VII).
- 4) It is further clarified that J&K Bank , in reference to the guidelines as referred in Rule 4 (1) of Companies CSR Rules, 2014 , shall not undertake any programme which is not in project form and sustainable in nature and shall discourage One-off events such as marathons/ awards/ charitable contribution/ advertisement/ sponsorships of TV programmes etc.

Annexure II –

FORMAT FOR THE ANNUAL REPORT ON CSR ACTIVITIES

TO BE INCLUDED IN THE BOARD'S REPORT

1. Brief outline on CSR Policy of the Company.
2. Composition of CSR Committee:

Sl. No.	Name of Director	Designation / Nature of Directorship	Number of meetings of CSR Committee held during the year	Number of meetings of CSR Committee attended during the year

3. Provide the web-link where Composition of CSR committee, CSR Policy and CSR projects approved by the board are disclosed on the website of the company
4. Provide the details of Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social responsibility Policy) Rules, 2014, if applicable (attach the report).
5. Details of the amount available for set off in pursuance of sub-rule (3) of rule 7 of the Companies (Corporate Social responsibility Policy) Rules, 2014 and amount required for set off for the financial year, if any

Sl. No.	Financial Year	Amount available for set-off from preceding financial years (in Rs)	Amount required to be set- off for the financial year, if any (in Rs)
1			
2			
3			
	Total		

6. Average net profit of the company as per section 135(5).
7. (a) Two percent of average net profit of the company as per section 135(5)
 - (b) Surplus arising out of the CSR projects or programmes or activities of the previous financial years.
 - (c) Amount required to be set off for the financial year, if any
 - (d) Total CSR obligation for the financial year (7a+7b-7c).

8. (a) CSR amount spent or unspent for the financial year:

Total Amount Spent for the Financial Year. (in Rs.)	Amount Unspent (in Rs.)				
	Total Amount transferred to Unspent CSR Account as per section 135(6)		Amount transferred to any fund specified under Schedule VII as per second proviso to section 135(5)		
	Amount	Date of Transfer	Name of the Fund	Amount	Date of Transfer

(b) Details of CSR amount spent against ongoing projects for the financial year:

1	2	3	4	5		6	7	8	9	10	11	
S No	Name of the project	Item from the list of activities in Schedule VII to the Act	Local area (Yes/No).	Location of the project.		Project duration.	Amount allocated for the project (in Rs)	Amount spent in the current financial Year (in Rs.).	Amount transferred to Unspent CSR Account for the project as per Section 135(6) (in Rs)	Mode of Implementation - Direct (Yes/No).	Mode of Implementation - Through Implementing Agency	
				State	District						Name	CSR Registration Number

(c) Details of CSR amount spent against other than ongoing projects for the financial year:

1	2	3	4	5		6	7	8	
S No	Name of the project	Item from the list of activities in Schedule VII to the Act	Local area (Yes/No).	Location of the project.		Amount spent for the project (in Rs.).	Mode of Implementation - Direct (Yes/No).	Mode of Implementation - Through Implementing Agency	
				State	District			Name	CSR Registration Number

(d) Amount spent in Administrative Overheads

(e) Amount spent on Impact Assessment, if applicable

(f) Total amount spent for the Financial Year (8b+8c+8d+8e)

(g) Excess amount for set off, if any

Sl. No	Particular	Amount (in Rs.)
(i)	Two percent of average net profit of the company as per section 135(5)	
(ii)	Total amount spent for the Financial Year	
(iii)	Excess amount spent for the financial year [(ii)-(i)]	
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous financial years, if any	
(v)	Amount available for set off in succeeding financial years [(iii)-(iv)]	

9. (a) Details of Unspent CSR amount for the preceding three financial years

Sl. No.	Preceding Financial Year.	Amount transferred to Unspent CSR Account under section 135 (6) (in Rs.)	Amount spent in the reporting Financial Year (in Rs)	Amount transferred to any fund specified under Schedule VII as per section 135(6), if any.			Amount remaining to be spent in succeeding financial years. (in Rs.)
				Name of the Fund	Amount (in Rs).	Date of transfer.	
1							
2							
3							
	Total						

(b) Details of CSR amount spent in the financial year for ongoing projects of the preceding financial year(s):

1	2	3	4	5	6	7	8	9
Sl. No	Project ID.	Name of the Project.	Financial Year in which the project was commenced.	Project duration.	Total amount allocated for the project (in Rs.).	Amount spent on the project in the reporting Financial Year (in Rs)	Cumulative amount spent at the end of reporting Financial Year. (in Rs)	Status of the project - Completed /Ongoing.
1								
2								
3								
	Total							

10. In case of creation or acquisition of capital asset, furnish the details relating to the asset so created or acquired through CSR spent in the financial year

(asset-wise details).

(a) Date of creation or acquisition of the capital asset(s).

(b) Amount of CSR spent for creation or acquisition of capital asset.

(c) Details of the entity or public authority or beneficiary under whose name such capital asset is registered, their address etc.

(d) Provide details of the capital asset(s) created or acquired (including complete address and location of the capital asset).

11. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per section 135(5).

Sd/- (Chief Executive Officer or Managing Director or Director).	Sd/- (Chairman CSR Committee).	Sd/- [Person specified under clause (d) of sub-section (1) of section 380 of the Act] (Wherever applicable).
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