

Corporate Social Responsibility Policy

(Approved by Board at its meeting held on March 18th, 2024)

❖ **Background:**

In compliance with the requirements of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended, the Company is, inter alia, required to:

- a. Constitute a Board Committee to formulate and recommend to the Board a Corporate Social Responsibility (CSR) Policy, recommend the amount of CSR expenditure and monitor the CSR activities of the Company from time to time.
- b. Ensure that the Company spends, in every financial year, at least two per cent of the average Net Profit, Profit before Tax (PBT) of the Company, made during the three immediately preceding financial years, in pursuance of its CSR Policy.

❖ **Philosophy:**

The Company is a responsible corporate which strives for the overall betterment of the society at large. To this end the Company seeks to undertake Corporate Social Responsibility (CSR) which extend beyond the ambit of business and focuses on society at large. Through the CSR there is a formation of a dynamic relationship between a company on one hand and the society on the other.

The main responsibilities of the Company towards society at large and to promote education, including special education and employment enhancing vocation skills especially among children, women, elderly a differently abled and livelihood enhancement projects.

❖ **Our Vision**

- a. The Company completely endorses reliability. It is committed to conduct business in a true, fair and ethical manner and takes up the responsibility to create a good impact in the society it belongs.
- b. The Company is committed towards improving the quality of lives of people in the communities in which it operates because society is an essential stakeholder and the purpose of its existence. The Company believes that giving back to the society through CSR activities is its moral duty.
- c. The Company aims to fulfil the requirements laid down under the Companies Act, 2013 and act diligently to comply with all its Rules and Regulations on CSR.

❖ **Applicability of the Policy**

The Company's CSR Policy has been developed in conformity with the provisions of Section 135 of the Companies Act, 2013 (referred to as the Act in this Policy) and in accordance with the CSR Rules (hereby referred to as the Rules) notified by the Ministry of Corporate Affairs, Government of India. This Policy shall apply to all CSR initiatives and activities taken up by the Company.



❖ **Objective of the CSR Policy**

The CSR Policy lays down guidelines for the Company to undertake CSR activities, which are directed towards positively contributing to society through various sustainable and social welfare initiatives. The CSR Policy of the Company shall be governed by the various provisions of the Companies Act, Companies (Corporate Social Responsibility) Rules, 2014 ("CSR Rules") and any other rules made thereunder, or that may apply from time to time.

The Company proposes to undertake the CSR activities in any of the following areas.

- a. **Eradicating hunger, poverty and malnutrition, promoting health care** including preventive health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of 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, 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.
- 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 art and handicrafts;
- f. **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;
- g. **training to promote rural sports**, nationally recognized sports, paralympic sports and Olympic sports.
- h. **contribution to the prime minister's national relief fund** or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- i. **Contribution to incubators or research and development projects** in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and
- j. **Contributions to public funded Universities**; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development
- k. **rural development projects, slum area development, disaster management**,
 - l. including relief, rehabilitation and reconstruction activities.
 - m. Any other activity as specified under the act, as amended from time to time.

For the purpose of the CSR Policy, the CSR activities shall exclude activities undertaken in pursuance of the normal course of business of the Company.



❖ **Implementation of CSR Policy:**

As per Section 135 of the Companies Act, 2013, the Board has constituted CSR Committee. The CSR Committee and the Board are responsible for ensuring that the Company undertakes CSR activities in accordance with the applicable law.

❖ **Responsibility of CSR Committee:**

The Committee shall hold meeting as and when required, to discuss various issues on implementation of the CSR Policy of the Company. The members would thrive to hold at least one meeting in a financial year.

- a. Monitor the implementation of the CSR activities undertaken by the Company.
- b. Prepare a status update in respect of each CSR activity.
- c. Deliberate upon and identify new CSR activities that the Company may undertake in that Financial year.
- d. Include the details of CSR activities undertaken by the Company during the financial year in the Company's Annual report, as required under section 134 of the Act.

❖ **Monitoring of CSR activities:**

The CSR Committee shall prepare a transparent monitoring mechanism for ensuring the implementation of CSR activities proposed to be undertaken by the Company. The CSR Committee shall provide the Board with a quarterly status update on the CSR expenditure.

❖ **External Assistance:**

The CSR Committee reserves the right to obtain professional advice from external sources (such as expert agencies, NGOs, governmental authorities, etc.) for the purpose of carrying out the CSR activities ("Third Parties"). Where the Company engages Third Parties, the CSR Committee shall constitute a robust monitoring and implementation mechanism, to ensure that the funds and other resources of the Company are being used in equitable and commercial judicious manner.

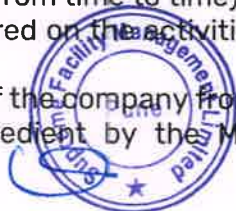
❖ **Meetings:**

The Committee shall hold meeting as and when required, to discuss various issues on implementation of the CSR Policy of the Company. The members would thrive to hold at least one meeting in a financial year.

The Committee shall periodically review the implementation of the CSR Programmes and issue necessary direction from time to time to ensure orderly and efficient execution of the CSR programmes in accordance with this Policy. It would be the responsibility of the CSR Committee to periodically keep the Board apprised of the status of the implementation of CSR activities.

❖ **Role of CSR Committee:**

- a. To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013 (as amended from time to time).
- b. To recommend the amount of expenditure to be incurred on the activities in a financial year.
- c. To monitor the Corporate Social Responsibility Policy of the company from time to time.
- d. Any other matter/thing as may be considered expedient by the Members of the



Committee in furtherance of and to comply with the CSR Policy of the Company.

❖ **Responsibilities of the Board:**

The Board shall:

- a. Form a CSR Committee and disclose the composition of the CSR Committee.
- b. Approve the CSR Policy after taking into account the recommendations made by the CSR Committee.
- c. Place the CSR Policy on the Company's website.
- d. Ensure implementation of the activities under CSR
- e. Ensure expenditure of requisite amount on CSR every year as per law.
- f. Disclose reasons for not spending the amount (if applicable) in the Annual Report to the Shareholders of the Company.
- g. Ensure that the administrative overheads are not more than 5% of the total CSR Expenditure.
- h. Ensure that the funds so disbursed have been utilized for the purposes and in the manner as approved by Board / CSR Committee and the Chief Financial Officer shall certify to the effect.
- i. Approve transfer of unspent CSR Amount in accordance with the law. The Accounts and Finance Team of the Company shall prepare the statement of spent and unspent CSR amounts and shall assist and facilitate for transfer of the same.

❖ **CSR Expenditure:**

The Board shall ensure that the Company spends in every financial year at least 2% of the average net profits of the Company made during the three immediately preceding financial years, on the CSR activities of the Company, or any other amount as may be specified from time to time.

❖ **Amendment:**

The CSR Committee shall review and recommend revisions to the CSR Policy at least once a year and additionally whenever it deems fit, and place before the Board the CSR policy containing such draft revisions for the Board's approval. Any change in the policy shall be approved by the Board. The Board reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever and the decision of the Board shall be final and binding. Any subsequent amendment/ modifications in the act or the rules framed thereunder or the SEBI listing regulations and/or other laws in this regard shall automatically apply to this policy.

❖ **Mandatory Display Of The Policy:**

A copy of the Policy shall be displayed by all Offices of the Company at a prominent place inside the Company's premises and on the Company's website.