



CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

Approved by Board on



CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY

Purpose

This policy sets out the Company's commitment & approach towards Corporate Social Responsibility based on our legacy of 'Giving Back to Society'. The Company is committed to improving the quality of life of the communities we serve through the CSR theme of 'Building Sustainable Livelihoods'. The Company endeavors to facilitate livelihood opportunities & socio-cultural development in areas of its operations.

Focus Areas

In accordance with the requirements of the Companies Act, 2013 ("the Act"), the Company's CSR programs shall mainly focus on the following areas:

- Vocational skill development programs
- Partnerships to preserve & promote indigenous heritage, culture, arts and handicrafts
- Disaster relief and rehabilitation programs
- Income-generation and livelihood enhancement programs

However, the Company may choose to undertake additional CSR Activities falling within the purview of Schedule VII of the Act, as may be amended from time to time, based on the recommendations of the CSR Committee and as may be approved by the Board of Directors.

Responsibility of the Board of Directors

The Board of the Company will be responsible for:

- approving the CSR Policy as formulated by the CSR Committee, with or without modifications and disclosing the CSR Policy in its report and also place it on the Company's website;
- considering the recommendations of the CSR Committee and providing appropriate instructions / directions to the CSR Committee when required;
- preparing a budget of expenditure to be applied for CSR projects.
- ensuring that in each financial year the Company spends at least 2% (two percent) of the average net profits of the Company, made during the 3 (three) preceding financial years, or such other amount as prescribed under the Companies Act, 2013 and the rules framed thereunder, in pursuance of the Policy;
- Ensuring that the administrative overheads do not exceed five percent of total CSR expenditure of the Company for the financial year.



- ensuring that every financial year funds committed by the Company for CSR activities are utilized effectively, and regularly monitoring implementation;
- disclosing in its annual report the names of CSR Committee members, the content of the CSR Policy and ensure annual reporting of its CSR activities on the Company website;
- ensuring annual reporting of CSR policy to the Ministry of Corporate Affairs, Government of India, as per the prescribed format; and
- Complying with the requirements under the Companies Act, 2013 and the rules framed thereunder regarding CSR.

As per Section 135 of the Companies Act, 2013, the reasons for under spending of the allocated CSR budget shall be specified in the Board's Report.

CSR Committee

- The CSR Committee shall comprise three or more directors of which, at least one will be an independent director.
- The CSR Committee of the Company shall be responsible for:
- Formulating and recommending to the Board the CSR Policy which shall indicate activities to be undertaken in line with Section 135 read with Schedule VII of the Act and the CSR Rules, as amended from time to time.
- Recommending to the Board the CSR expenditure to be incurred.
- Monitor the implementation of the CSR Policy from time to time
- Formulating and recommending to the Board, an Annual Action Plan in pursuance of its CSR Policy.

CSR Budget

The amounts to be spent by the Company shall be as stipulated under the Act, as amended from time to time (presently 2% of the average net profits of the Company for the preceding three financial years) and as approved by the Board. Any surplus arising out of the CSR projects or programs or activities shall not form part of business profits of the Company.

Annual Action Plan

An Annual Action plan would be formulated on the basis of available CSR budgets and shall include the list of CSR projects or programs which company plans to undertake during the financial year, further specifying modalities of execution of such project or programs, their



implementation schedules, monitoring and reporting mechanism for such projects and need of impact assessment, if any for the said projects.

Guiding Principles for selection, implementation and monitoring of CSR activities

The Company's CSR Activities shall mainly focus on the following areas:

1. Vocational Skill Development Programs:
2. Partnerships to Preserve & Promote Indigenous Heritage, Culture, Arts and Handicrafts
3. Income-generation and Livelihood Enhancement Programs:
4. Disaster Relief and Rehabilitation Programs
5. Healthcare sectors

Target Communities

The Company's target communities shall include rural, less-privileged, school dropout, differently abled, marginalized youth and women; indigenous artisans, disaster victims, Hospitals which are eligible to receive CSR Funds and other such groups associated with our focus areas.

Implementation & Monitoring Structure

Implementation and monitoring of the CSR activities will be overseen by the CSR Committee.

- CSR committee at Board level provides broad direction for CSR planning and conducts biennial reviews to ensure desired impact.

Project Monitoring:

- Project monitoring shall include periodic field visits, comprehensive documentation, and if required interaction with beneficiary communities.
- The CSR Committee shall periodically review the CSR project reports and the same shall be annually presented to the Board.

GENERAL:

- A. The CSR Policy recommended by the CSR Committee and approved by the Board shall be displayed in the Company's website for public viewing.
- B. In case of any doubt with regard to any provision of this CSR Policy and also in respect of matters not covered herein, a reference should be made to the CSR Committee. In all such matters, the interpretation and decision of the CSR Committee shall be final.



- C. All provisions of the CSR Policy would be subject to revision/amendment in accordance with the applicable laws.
- D. The Company reserves the right to modify, cancel, add, or amend this CSR Policy.

AMENDMENTS TO THE CSR POLICY:

The Board of the Company shall have the powers to revise/modify/amend this CSR Policy from time to time, as the Board may think fit, based on the recommendations to be made by the CSR Committee to confirm to the revision/ amendment, if any, to be made to the Act or the rules made thereunder.