

# **CORPORATE SOCIAL RESPONSIBILITY POLICY**

## **1. Short Title and Applicability**

This policy, describes the responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programs for welfare & sustainable development of the community at large, is titled as Corporate Social Responsibility (CSR) Policy'.

This policy shall apply to all CSR initiatives and activities taken up at the various locations, as decided by the CSR Committee and / or the Board of Board of Directors of the Company for the benefit of various segments of the society. We wish every life to be empowered and every deed to have a meaningful impact on society.

The CSR committee shall be a 2 member committee consisting of Chairman and another member.

The Policy shall be further governed by the provisions of the Companies Act, 2013, and the rules framed thereunder by the Ministry of Corporate Affairs i.e., the Companies (Corporate Social Responsibility Policy) Rules, 2014 and other statutory provisions governing the matter.

## **2. SCOPE**

### 2.1 Areas / Localities to be covered

The Company shall give preference to the local area and the surrounding areas where the Company operates, for spending the amount earmarked for CSR activities. On need basis, the CSR activities could be extended to any area of the Country.

### 2.2 Activities

The Company shall undertake CSR projects or programs for and related to the CSR activities as listed hereunder which fall within the purview of the activities specified in Schedule VII of the Companies Act, 2013.

- i) eradicating hunger, poverty and malnutrition, promoting healthcare including preventive health care and sanitation and making available safe drinking water;
- ii) promoting education including special education, and all strata of society and employment enhancing vocational skills, especially among children, women, elderly, and the differently abled and livelihood enhancement projects;

- iii) 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;
- 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;
- 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 force veterans, war widows and their dependents;
- vii) training to promote rural sports, nationally recognized sports, paralympic sports and Olympic Sports;
- viii) contribution to Prime Ministers National Relief 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
- ix) contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government
- x) Rural Development Projects.
- xi) Slum area development
- xii) Swachh Bharat Abhiyan, Swachh Vidhyalaya, construction of toilet facility and connected infrastructure facilities and any other programme promoting sanitation, sewerage, toilet facilities, etc.

The CSR Committee and the Board of Directors shall be authorized to consider any other CSR activities which will be permissible under the provisions of the Companies Act, 2013 or Rules framed thereunder from time to time including any modifications thereto. As far as possible, efforts will be made to coordinate with similar CSR activities that are taken up by the other companies of the Central Government or State Government in those areas.

The CSR projects or programs or activities that benefit only the employees of the Company and their families shall not be considered as CSR activities in accordance with the provisions of the Companies Act, 2013 and the rules framed thereunder.

### **3. RESOURCES, IDENTIFICATION AND APPROVAL PROCESS**

#### 3.1 Resources / Fund allocation

For achieving its CSR objectives through implementation of meaningful and sustainable CSR programs, the Company will allocate / earmark, in every financial year, at least 2% (two per cent) of the average net profits of the Company made during the three immediate preceding financial years, as its CSR Budget for the year. The average net profit shall be calculated in accordance with the provisions of Section 198 of the Companies Act, 2013.

Any unspent / unutilised funds so allocated/earmarked under CSR Budget of any particular year will be carried forward to the following year, i.e., the CSR budget will be non-lapsable in nature.

#### 3.2 Identification Process

The Company shall identify the projects or programmer through either of the following ways :

- i) Need identification studies by external agencies / institutions.
- ii) Internal need assessment by cross functional team.
- iii) Receipt of proposals/requests from District Administration/local Govt. etc.
- iv) Discussions and request with local representatives/Civic bodies/Citizen's forums/voluntary organizations.
- v) Discretion of the CSR Committee and / or the Board of Directors.
- vi) Any other means or source as may be deemed fit.

#### 3.3 Approval Process

CSR programs as may be identified will be required to be put up to the CSR Committee for their consideration and recommendation for approval by the Board of Directors of the Company..

The programs approved by the CSR Committee would be put before the Board of Directors of the Company for their approval.

### **4. MODALITIES OF EXECUTION AND IMPLEMENTATION**

#### 4.1 Modalities of Execution

The investment in CSR activities should be project or program based and for every project or program, before execution of the project or program, the modalities of execution and time framed periodic mile-stones will be finalized.

The CSR activities may be undertaken and / or implemented by or through:

- i) the Company itself under the guidance and supervision of the CSR Committee or Board of Directors or any responsible person authorized in this behalf;
- ii) Registered trusts or society or company established by the Company or its holding or subsidiary or associate company.
- iii) Registered trusts or society or companies incorporated under Section 8 of the Companies Act, 2013 or Section 25 of the Companies Act, 1956.
- iv) Registered trusts or society or company which is not established by the Company or its holding or subsidiary or associate company having an established track record of three years.
- v) Collaboration with other entities allowed to engage in CSR activities.

The Company may also collaborate with other companies of the Promoter Group Companies for undertaking projects or programs or CSR activities in such a manner that the CSR committee of the Company is in a position to report separately on such projects or programs or activities.

#### 4.2 Implementation

The time period / duration over which a particular project or program or activity will be spread, will depend on its nature, extent of coverage and the intended impact of the same.

The projects or programs or activities which involve considerable financial commitment and are undertaken on a timeframe of 2.5 years, will be considered as 'flagship programs' and will be accorded enhanced significance.

The Company will follow a project / program / activity based accountability approach to stress on the long term sustainability of CSR activities, where its action plan will be distinguished as 'Short.term', 'Medium.Term & Long Term; qualified as

- i) Short Term – 6 months to 1 year
- ii) Medium Term – 1 year to 2 years
- iii) Long Term – 2 year and above – 'Flagship programs'.

While identifying long term programs, all efforts must be made to the extent possible to define the following:

- i) Program objectives
- ii) Baseline survey – It would give the basis on which the outcome of the program would be measured.

- iii) Implementation schedules. Timelines for milestones of the program will need to be prescribed
- iv) Responsibilities and authorities for the funds to be spent reasonable and for the assigned purpose, of the concerned CSR activity and completion of projects within specified timelines, except when extended by prior approval by the CSR Committee
- v) Major results expected and measurable outcome

## **5 MONITORING**

To ensure effective implementation of the CSR activities undertaken, an inhouse monitoring mechanism will be put in place. The progress of CSR activities under implementation will be reported to CSR Committee / Board time to time basis.

The will do studies on a periodic basis, through independent professional third parties / professional institutions, especially on the strategic and high value programs.

The monitoring team will also try to obtain feedback from beneficiaries about the activities.

Appropriate documentation of the CSR Policy, CSR activities, executing partners, and expenditure entailed will be undertaken on a regular basis.

CSR initiatives of the Company will also be reported in the Annual Report of the Company and the website of the Company in accordance with the statutory provisions.

## **6 GENERAL**

In case of any doubt or difficulty with regard to any provision of this policy or implementation of any CSR activity and also in respect of matters not covered herein, a reference may be made to the CSR Committee. In all such matters, the interpretation & decision of the CSR Committee shall be final.

Any or all provisions of the CSR Policy would be subject to revision / amendment in accordance with the statutory provisions on the subject as may be stipulated by the Government, from time to time.