

CORPORATE SOCIAL RESPONSIBILITY POLICY

(I) PREAMBLE

The Policy outlines the company's responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking activities for welfare & sustainable development of the community at large.

The core elements of CSR are: i) the continuing commitment by business to ethical principles; ii) protection of human rights and iii) care for the environment while improving the quality of life of all the stakeholders including the local community and society at large.

It is Company's conscious strategy to design and implement Social Investments / CSR programs, by enriching value chains that encompass the disadvantaged sections of society, especially those residing in rural India, through economic empowerment based on grass-root capacity building.

This Policy shall apply to all CSR initiatives and activities taken up at the various work centres and locations of the company, for the benefit of different segments of the society, specifically the deprived, under privileged and differently abled persons.

(II) SCOPE / LIST OF CSR ACTIVITIES

The company would carry out its CSR activities with the objective of overall National and Community Development. At the same time, the company would give preference to the local areas around the locations where it operates in India including Maharashtra and Rajasthan.

The company will undertake CSR activities to do overall good to the community, with special emphasis on activities for the benefit of the poor and needy sections of the society.

In particular, the company will undertake CSR activities as specified in Schedule VII to the Companies Act, 2013, but will not be limited to the following:-

- (i) 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;
- (ii) promoting education, including special education and employment enhancing vocation 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;

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- (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 and handicrafts;
- (vi) measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
- (viii) contribution to the Prime Minister's 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"

Without prejudice to the above, following activities, by way of illustration, may also be carried out by the company, if it deems fit:-

- Curative health care, surgery, eye donation camps, skin donation camps, blood donation activities, therapy camps, dental camps, acupuncture camps, cataract camps, etc.
- To participate in building a healthy community through continuing initiatives in several areas of healthcare, with a focus on mother & child care and HIV/AIDS awareness.
- Literacy / Awareness programmes and activities in various social & well being areas.
- Research activities, economic, industrial, social research, research professorships, research chair, etc.
- Furtherance & promotion of recognized ideologies like the Gandhian and Sarvodaya ideologies, Swami Vivekananda Missions, national integration, communal harmony etc.

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- Furtherance and promotion of practice of alternative Indian traditional medical practice such as homeopathy, ayurvedic, siddha, naturopathy and yoga therapies, for the benefit of community at large.
- Hostels and boarding rooms, reading rooms, convalescence / asylum rooms for poor and the needy.
- Restoration & beautification of a city, town, village, museum, gardens, parks, public recreation centres etc.
- Disaster management activities and Relief to victims of natural calamities.
- Activities relating to irrigation, wells, dams etc. for improving livelihood of farmers and agriculturists.
- Promotion of nationally recognized sports (not only training).
- Infrastructure activities, essentially for helping the poor and the needy

(III) WHAT IS NOT CSR

CSR activities will not, however, include the following:-

- Activities undertaken in pursuance of Company's normal course of business;
- Activities which benefit only the employees of the company and their families;
- Contribution directly or indirectly to any political parties.
- Activities undertaken outside the country

(IV) MODALITIES OF EXECUTION OF PROJECTS / PROGRAMMES

a) CSR Committee:

The Company has constituted a CSR Committee of the Board consisting of Mr. Mukesh Sawlani, Chairman, Ms. Anita Dongre, Director and Mr. Shantanu Rastogi.

b) CSR Vehicle:

- i) CSR activities will be undertaken directly or through a registered trust or a registered society or a company established by the company or its holding or subsidiary or associate company under Section 8 of the Act.
- ii) If any donation/contribution is to be given to any other entity for CSR activity, preference will be given to such entities/Trust having track record in undertaking similar programs or projects.

- iii) Further, in such a case, the company will specify the project or programme to be undertaken through these entities, the modalities of utilization of funds on such projects or programs and the monitoring and reporting mechanism.
- iv) The company may also collaborate with other companies for undertaking projects or programs in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programs in accordance with the prescribed CSR Rules.
- v) Company may build CSR capacities of its own personnel as well as those of the implementing agencies through institutions with established track records, subject to the prescribed CSR Rules.

(V) MONITORING AND ASSESSMENT

- i) **Release of funds for CSR Project/Programme:** The amounts sanctioned for a CSR project or programme, will be released in stages or installments as per progress, as may be determined by the CSR Committee. CSR Committee may design the procedure/ guidelines applicable from time to time and release of funds to any project in a year shall be as per the guidelines finalized by the CSR Committee.
- ii) **Review by Board/CSR committee:** On a quarterly basis, the Board of Directors and CSR Committee will review the implementation of CSR.
- iii) **Utilisation Certificate:** Funds released/to be released to the implementing agency would be based on satisfactory utilization certificate duly certified by an authorized officer / CEO of the donee entity and satisfactory performance report submitted by the said person, as may be decided by the CSR Committee.
- iv) **External Agency assessment:** The impact assessment/evaluation of major projects may be carried out by an external agency to critically assess the fulfillment of project objectives.
- v) **Audit:** The amount spent on CSR by the company will be subject to audit.
- vi) **Reporting in the Annual Report of the Company:** CSR Policy and initiatives of the Company will be reported in the Annual Report of the Company in the manner prescribed under the CSR Rules. All the CSR & Sustainability projects would be documented and hosted on the company website also.

(VI) GENERAL

The CSR Policy referred to above is to be read in conjunction with Companies Act, 2013 and Companies (CSR Policy) Rules, 2014.

Any or all provisions of the CSR Policy would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued from the Government from time to time or as decided by the Board of Directors of the Company.

The above Policy Guidelines are subject to review at suitable intervals and subject to revision accordingly.