

## **CORPORATE SOCIAL RESPONSIBILITY (“CSR”) POLICY**

### **1. Introduction and Objectives:**

The Company strongly believes that business growth & success, is intertwined with the development, growth and prosperity of the larger society in which it operates. The external social environment has to progress meaningfully, and therefore it is imperative for businesses to invest in the future by actively associating with social development & enabling activities. With this objective, the Board of Directors of the Company had approved the Corporate Social Responsibility Policy.

### **2. Corporate Social Responsibility (CSR) Philosophy:**

Our approach to CSR is to create sustainable programs that actively contribute to and support the socio-economic development of our country. The Company’s CSR is beyond its own immediate business interests and intended to make a positive difference to the environment. At the Company, we are:

- 1) Committed to promote the principle of inclusive growth and equitable development.
- 2) Committed to engage and work actively in areas of promoting education in general.
- 3) Committed to human development through skill development & skill upgradation activities.

### **3. Focus Areas:**

The Company will explore multiple initiatives through donations or contributions to the approved Non-Government Organizations or Non-Profit Organizations for focusing on the below mentioned area of activity as listed in Schedule VII of the Act:

- **Education** - Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- **Gender Equality** - 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.

### **4. Financial Resources:**

In order to achieve the policy objectives, the Company will endeavor to determine in the first quarter of every financial year the funds to be expended till end of the next year and will allocate for focus activity a certain percentage of the funds available. The Company’s Board will then evaluate the proposals during the course of the year, and disperse the funds after due process of approval.

In the light of **Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021**, unless the unspent amount relates to any ongoing project referred to in section 135(6)

of the Act, the Company shall transfer such unspent amount to a Fund specified in Schedule VII, within a period of 6 months of the expiry of the financial year.

#### **5. Governance Structure:**

The Corporate Social Responsibility (CSR) Committee of the Company will be responsible for formulating and implementation of all the CSR projects or contributing to the approved funds as mentioned in Schedule VII of the Act. The Corporate Social Responsibility (CSR) Committee will be responsible for ensuring that all the funded activities are properly evaluated before fund release and will also put in place a monitoring mechanism to track project progress.

The Corporate Social Responsibility (CSR) Committee will also be empowered to add / co-opt members as and when required, who may either be employees of the Company or outside experts, who will help in coordinating the various activities and also help to monitor the same. The Corporate Social Responsibility (CSR) Committee will also determine whether any non-budgeted fund release is warranted and if so, will ensure that it is ratified in the next Board meeting immediately following.

#### **6. Monitoring and Reporting Mechanism:**

The Chief Financial Officer (“CFO”) of the Company or any senior personnel from the Financial Management Function shall ensure that the Board of Directors of the Company has been informed about the projects to be undertaken for the financial year and the funds so disbursed are utilized for the activities stated in the CSR Policy or that the contribution is duly made to the funds as approved in the Schedule VII of the Act. In this regard, the CFO or any such senior personnel shall certify annually that funds so disbursed have been utilized for the purposes and in the manner as approved by the Board and such certification shall be annexed to the Board’s Report for the respective Financial Year.

#### **CSR COMMITTEE MEMBERS**

Mr. Prithvi Pal Singh Haldea  
**Chairman**

Mrs. Priyanka Haldea  
**Director**

Mr. Pranav Haldea  
**Managing Director**

#### **CSR ACTIVITIES**