

CORPORATE SOCIAL RESPONSIBILITY POLICY

Preamble

Corporate Social Responsibility (CSR) is linked to sustainability. Such decisions are mainly based on social and environmental consequences. It is the Company's intent to make a positive difference in society.

Focus areas

The Company supports various bodies in carrying out activities in the areas of rural development, education, health care, general semantics, etc.

CSR Objectives

The main objective of the CSR Policy is to lay down guidelines for undertaking CSR initiatives in accordance with the Companies Act, 2013 and rules made thereunder, for enabling sustainable growth along with sustainable development of society.

The CSR activities of the Company shall include, but not be limited to any or all of the sectors/activities as may be prescribed by Schedule VII of the Companies Act, 2013, and amended from time to time. Further, the Company will review the sectors/activities from time to time and make additions/ deletions/ clarifications to the above sectors/activities.

This Policy covers the proposed CSR activities to be undertaken by the Company and ensures that they are in line with Schedule VII of the Act as amended from time to time. It covers the CSR activities which are being carried out in India only and includes a strategy that defines plans for future CSR activities.

Projects or Programs

Various activities may be undertaken on the basis of objectives as set out herein, referred to as projects or programs. Such projects or programs may be undertaken through a registered trust or a registered society or a company established for this purpose or by its holding or subsidiary Company or associate company or through such agencies with an established track record of at least three financial years.

Constitution of CSR committee

The Following Directors are presently members of the CSR Committee:

1. Mr. Sumir Verma
2. Mr. Fazal Ahad

The Committee shall be empowered to select programs in line with the objectives of the CSR Policy.

Duties & Responsibilities of CSR Committee

- Formulate and recommend to the Board the CSR activities/programs to be undertaken by the Company.
- Recommend to the Board the CSR Expenditure to be incurred on the CSR activities/programs.
- Institute a transparent mechanism for implementation of the CSR projects and activities. Effectively

monitor the execution of the CSR activities.

- Prepare an annual report of the CSR activities undertaken for the Company and submit the report to the Board.

Focus areas and Activities to be undertaken

The Company shall undertake CSR activities in the following areas:

- Promoting education, including special education and employment enhancing vocational skills, especially among children, women, elderly, and the differently abled; livelihood enhancement projects of education and improving infrastructure of schools or educational institutions;
- Providing medical relief and rehabilitation to communities who either don't have access to quality health care or cannot afford it;
- Eradicating hunger, poverty, and malnutrition, promoting health care, preventive health care, and sanitation, and making available safe drinking water;
- Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, daycare centres, and such facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;
- Measures for the benefit of armed forces veterans, war widows, and their dependents;
- Training to promote rural sports, nationally recognized sports, Paralympics sports, and Olympic sports;
- Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development, relief, and welfare of the scheduled castes, the scheduled tribes, other backward classes, minorities, and women;
- Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- Rural development projects;
- Slum area development;
- Provide relief, support, rehabilitation, reconstruction activities, etc. for disaster management in case of natural calamities or emergencies, etc.
- Conservation of natural resources and ensuring environmental sustainability, animal welfare, protecting flora and fauna on the recommendation of the CSR committee

In addition to the areas of emphasis specified above, the Company may select any area/ sector/ activity or head of activities, as may be specified in Schedule VII to the Companies Act, 2013 including any amendments or modifications as may be introduced from time to time.

The Company may undertake these activities directly or through NGO/charitable/non-profit organizations.

Budget

The Company proposes to spend at least 2% of the average net profit on Corporate Social Responsibility (CSR) made during the immediately preceding three (3) financial years so long as mandated by the law(s) in force or subject to the approval of the CSR Committee. Net profit shall be calculated as per the

provisions of the Companies Act, 2013, or other such legislation as may be applicable from time to time.

CSR expenditure

CSR expenditure shall include all expenditures including contributions to the corpus for projects or programs relating to CSR activities approved by the Board on the recommendation of its CSR Committee.

Surplus arising out of CSR activities

Any surpluses arising out of CSR projects, programs, or activities shall not form a part of the business profits of the Company.

Process

The CSR Committee shall institute a transparent monitoring mechanism for the implementation of the Corporate Social Responsibility projects or programs or activities undertaken by the Company and significantly higher engagement for the community.