CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR)

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 element of CSR is to directly / indirectly undertake projects and programme which will enhance the quality of life and economic well-being of the communities and society at large.

This policy shall apply to all CSR initiatives and activities to be taken up by the Company directly and / or indirectly at its various work centers and locations, for the benefit of different segments of society.

SCOPE OF CSR ACTIVITIES

The Company would carry out its CSR activities with the objective of overall national & community development. At the same time, the Company would give preference to the local area for spending the amount earmarked in CSR activities. The Company will undertake activities to do overall good to the community.

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 preventive health, care and sanitation including contribution to the Swach 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 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 centers and such other facilities for senior citizens and measures for reducing inequalities face 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 including contribution to the Clean Ganga Fund setup 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 work of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
- (vi) measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) training to promote rural sports, nationally recognized 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;

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- (ix) contribution or fund 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, special focus shall be given by the Company on the following activities, for its CSR spending:-

Sr. No.	Area	Activities / Initiatives / Programs
		a) To establish technical educational institutions for mechanical training, drivers training etc. which can be covered under promoting education or vocational skill.
1.	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.	b) Conservation & renovation of school buildings, classrooms which can be covered under promoting education.
		c) Construction and running of schools and libraries, vocational training and special education institutes, providing financial assistance and scholarships for higher education. Undertaking and skills and entrepreneurship programs.
2.	Contribution / Financial Assistance	a) Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socioeconomic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women.
3.	Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agro forestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of river Ganga.	
4.	Disaster Relief	a) Disaster management activities and relief to victims of natural calamities.

CSR COMMITTEE

The Company has constituted CSR Committee as per the applicable law consisting of following mentioned Directors:



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- a. Mr. Sadananda Shetty, Director
- b. Mr. Mukesh Kalmadi, Jt. Managing Director
- c. Mr. Shridhar Kalmadi, Managing Director
- d. Mr. Kushal Hegde, Director

Note: On resignation of the Mr. Shridhar S Kalmadi – Managing Director of the Company, the Board of Directors of the Company in their meeting held on 31/01/2022, reconstituted the CSR Committee consisting of the following mentioned directors:

- a. Mr. Sadananda Shetty, Director
- b. Mr. Mukesh Kalmadi, Managing Director
- c. Mr. Kushal Hegde, Director

The committee shall be responsible for the implementation, monitoring and review of this policy and various projects/activities undertaken under the policy. The CSR Committee shall submit periodical reports to the Board of Directors.

CSR SPEND / SOURCES OF SPENDING

- a. The CSR Committee shall endeavour to spend at least 2% of the average net profit during the preceding 3 financial years on CSR activities as enumerated above. Any surplus arising out of the contribution made for CSR Activities shall not form part of the business profit of the Company and redeployed for such activities
- b. CSR activities will be undertaken either by the Company or through a trust or a section 8 Company (under the Companies Act, 2013) to be establish by the Company.
- c. If any CSR contribution is to be given to other entity i.e. trust, society or a Company that is not established by the Company for CSR activity, preference will be given to such entities / trust having track record in undertaking similar programme or projects.
- d. Further, in such a case, Company will specify the project and programme to be undertaken through these entities, the modalities of utilization of funds on such projects or programme and the monitoring and reporting mechanism.
- e. The Company may also collaborate with other Companies for undertaking projects and programs in such manner that the CSR committees of the respective Companies are in the position to report separately on such projects and programs in accordance with the prescribed CSR Rules.

MONITORING AND REPORTING

The CSR Committee will be responsible for monitoring the CSR activities and report to the Board from time to time. The CSR Committee has the powers to:

- 1. Seek monitoring and implementation report from the organizations receiving CSR funds.
- 2. Delegate a designated Company official to co-ordinate with the organization receiving CSR funds to inspect the activities undertaken and ensure information in a timely manner.
- 3. The Committee may empower the CEO and CFO to spend such amount as they think appropriate for CSR activities and / or some other strategic CSR contingencies that may arise during any financial year. The amount spent as above shall be put up for ratification of the Committee at its next meeting and shall report to the Board accordingly.

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- 4. The Committee Members will receive in a prescribed format, a quarterly report of CSR spend.
- 5. CSR Policy and initiatives of the Company will be reported in the Annual Report of the Company in the manner prescribed under CSR Policy Rules.

GENERAL

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

All the provisions of the CSR Policy will be subject to revision /amendment in accordance with the guidelines on the subject as may be issued by 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.

Signature(s):

Mr. Mukesh Kalmadi (DIN:00044258) Managing Director O PRIVATE LA PUNE *

Signature(s):

Mr. Sadananda Shetty (DIN:00063576)

Director

Date:27.03.2023