

# **THE COMPANY'S CSR POLICY**

## **1. SHORT TITLE & APPLICABILITY:**

**1.1** The Corporate Social Responsibility policy of the Company encompasses its philosophy for delineating its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community at large. The Corporate Social Responsibility policy of the Company is titled as the **'THE COMPANY'S CSR POLICY'**.

**1.2** This policy shall apply to all CSR initiatives and activities taken up by **THE COMPANY** for the benefit of different segments of the society and our earth at large.

## **2. AIMS AND OBJECTIVES**

As a responsible corporate entity, the Company will consistently strive for opportunities to meet the expectation of its stake holders by pursuing the concept of sustainable development with focus on the following social welfare activities and will cover the activities and objectives as per schedule VII of the Companies Act, 2013 as mentioned below.

## **3. ACTIVITIES UNDER CORPORATE SOCIAL RESPONSIBILITY**

The Company would endeavor to adopt an integrated approach to address the community, societal & environmental concerns by taking up a range of the following activities, which shall be taken up strategically, in a focused manner to the extent possible and allowed as per Section 135 of the Companies Act, 2013 and the applicable rules and regulations as may be prescribed in this regard, including any modification (s) thereof.

### **3.1 CSR ACTIVITIES: CSR activities will be undertaken within India and location of CSR efforts will be decided by the CSR Committee.**

CSR activities will include the following activities relating to:—

- (i) Eradicating hunger, poverty, malnutrition, promoting preventive healthcare and sanitation and making available safe drinking water.
- (ii) Promotion of 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 centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- (iv) Measures for the benefit of armed forces veterans, war widows and their dependants
- (v) Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports.
- (vi) 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.
- (vii) Protection of national heritage, art and culture including restoration of buildings and sites of historically importance and works of art, setting up public libraries, promotion and development of traditional arts and handicrafts.
- (viii) Contributions or funds provided to technology incubators located within academic institutions which are approved by Central Government

- (ix) Rural development projects
- (x) Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Governments for socio-economic development and relief and funds for the welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women; and
- (xi) Such other matters as may be prescribed by the Central Government and approved by the Board of Directors/ CSR Committee, as the case may be.

#### **4. PROHIBITED ACTIVITIES UNDER CSR**

The Corporation will abstain from carrying out the following activities under CSR that may create dissatisfaction in any section of the Society:-

- I. Activities concerned with religion like construction of temple/mosque etc.
- II. Activities disturbing social harmony in any manner.
- III. Activities exclusively for the benefit of employees of the company or their family members.
- IV. Such other activities as may be prohibited by Central Government

#### **5. COMPOSITION OF CSR COMMITTEE**

The CSR Committee shall consist of the following directors:

Mr. Harender Singh Bhatia (Chairman);  
Mr. Kawaljeet Singh Bhatia (Member);  
Mr. Gurdeep Singh Bhatia (Member);  
Mrs. Jasmeet Kaur Bhatia (Member)

#### **6. RESPONSIBILITY OF CSR COMMITTEE**

The responsibilities of CSR Committee include:

- a. Formulate and recommend to the Board, a Corporate Social Responsibility Policy in compliance with Section 135 of the Companies Act, 2013
- b. Identify the activities to be undertaken as per Schedule VII of the Companies Act, 2013.
- c. Institute a transparent monitoring mechanism for implementation of the CSR projects or programs or activities undertaken by the Company.
- d. Recommend the amount of CSR expenditure to be incurred on the earmarked CSR activities.
- e. Monitor the implementation of the CSR Policy from time to time.
- f. Such other functions as the Board may deem fit

#### **7. IMPLEMENTATION MECHANISM**

The Company would consider the following broad parameters while identifying/selecting the schemes/projects:

- 7.1** The assistance under CSR activities may be in the form of donation, so as to create social impact and visibility.
- 7.2** While implementing the identified activities, time frames and milestones may be predefined.
- 7.3** The CSR projects may be based on fundamentals of sustainable development
- 7.4** In line with the Companies Act, 2013, donation based assistance/ grants, should not be less than limits as may be prescribed by the Central Government/ Ministry of Corporate Affairs from time to time.
- 7.5** Proper screening, checks and balances shall be ensured while sanctioning the CSR proposals.

## **8. PLANNING AND COORDINATION**

**8.1** Subject to the above, the Company will prepare an annual plan for CSR activities for each year within the budgetary provisions and will place the same before the CSR Committee / the Board of Directors for approval, as the case may be.

**8.2** The focus of benefits will be in line with the activities mentioned in this document and as per programs, projects and schemes approved.

## **9. MONITORING AND EVALUATION**

Regular update on the CSR initiatives undertaken and/ or to be undertaken shall be given to the CSR Committee. The impact of the CSR activities may be quantified to the extent possible. The Chairman of CSR Committee shall draw a time frame from the date of initiation. In case of any delay noticed while monitoring the CSR initiatives, remedial measures shall be taken for timely completion of the Project.

## **10. ALLOCATION OF FUNDS**

A total allocation of amount as prescribed by the Companies Act, 2013 and approved by the Board will be earmarked every year for implementation of CSR programmes.

## **11. GENERAL**

**11.1** The surplus arising out of the CSR projects or programs or activities shall not form part of the business profits of the Company;

**11.2** In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to the CSR Committee. In all such matters, the decision of the CSR Committee shall be final.

**11.3** Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the Companies Act, 2013, rules and regulations as may be prescribed by the Central Government, from time to time.

**11.4** The Company reserves the right to modify, cancel, add, or amend any of these Rules.

## **12. EFFECTIVE DATE:**

This policy is effective from 7<sup>th</sup> February, 2019.