CORPORATE SOCIAL RESPONSIBILITY POLICY

PREAMBLE

Company seeks to be a good corporate citizen in all aspects of its operations and activities. It is the Company's intent to make a positive difference to society. It recognizes that it cannot do it all, so that if there are choices to be made, prioritization will be towards doing fewer projects with greater impact and focusing initiatives on communities in which the Company lives and operates. We not only acknowledge but firmly believe in the fact of giving back tothe society thereby inspiring, facilitating and supporting entrepreneurs come to us naturally.

DEFINITIONS:

a) **"Act"** means the Companies Act, 2013, Rules framed thereunder and any amendments thereto.

b) **"Applicable Laws"** shall mean the Companies Act, 2013 and the rules made thereunder, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; as amended from time to time and such other act, rules or regulations.

c) **"Board of Directors"** or **"Board"** means the collective body of the Directors of the Company.

d) **"Corporate Social Responsibility (CSR)"** means and includes but is not limited to-:

- Projects or programs relating to activities specified in Schedule VII to the Act or
- Projects or programs relating to activities undertaken by the board in pursuance of recommendations of the CSR Committee of the Board as per declared CSR Policy of the Company subject to the condition that such policy will cover subjects enumerated in Schedule VII of the Companies Act 2013.

e) **"CSR Committee"** shall mean the Corporate Social Responsibility Committee constituted by the Board of the Company in accordance with the Act, consisting of three or more directors, out of which at least one director shall be an independent director.

f) **"CSR Policy"** related to the activities to be undertaken by the company as specified in Schedule VII to the Companies Act 2013 and the expenditure thereon, excluding activities undertaken in pursuance of normal course of business of the company.

g) **"Financial Year"** shall mean the period beginning from 1st April of every year to March 31st of the succeeding year.

h) **"Net Profit"** shall not include such sums as may be prescribed by the act, and shall be calculated in accordance with the provisions of section 198.

i) **"Rules"** shall mean the Companies (Corporate Social Responsibility) Rules 2014, including any re-enactment, modifications or amendments thereof.

j) **"Regulations"** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and any amendments thereto.

VISION AND COMMITMENTS

Our vision is to drive "holistic empowerment" of the community through implementation ofsustainable initiative which will have maximum societal impact by identifying the critical needs and gaps.

We shall remain committed to the following operating principles-

- Conducting business in a socially responsible and ethical manner;
- Supporting human rights;
- Engaging, learning from, respecting and supporting the local communities and cultureswith which we work.
- Protecting the environment;
- development and safety of the people;
- Creating opportunities for employees to participate in socially responsible initiatives;
- Ensuring the implementation of CSR initiatives in letter and spirit through appropriateprocedures and reporting.

CSR OBJECTIVES

The Company may carry out any one or more of the CSR activities, notified under Section 135 of the Companies Act, 2013 and rules made there under and as amended from time to time, inter-alia the following inclusive but not limited to the following:

i. Eradicating hunger, poverty & malnutrition, promoting preventive health care & sanitation& making available safe drinking water;

ii. Promoting education, including special education & employment enhancing vocation skills especially among children, women, elderly & the differently unable & livelihood enhancement projects;

iii. Promoting gender equality, empowering women, setting up homes & hostels for women & orphans, setting up old age homes, day care centers & such other facilities for senior citizens & measures for reducing inequalities faced by socially & economically backward groups;

iv. Reducing child mortality and improving maternal health by providing good hospital facilities and low cost medicines;

v. Providing with hospital and dispensary facilities with more focus on clean and good sanitation so as to combat human immunodeficiency virus, acquired immune deficiency syndrome, malaria and other diseases;

vi. Ensuring environmental sustainability, ecological balance, protection of flora & fauna, animal welfare, agro forestry, conservation of natural resources & maintaining quality of soil, air & water;

vii. Employment enhancing vocational skills

viii. Protection of national heritage, art & culture including restoration of buildings & sites ofhistorical importance & works of art; setting up public libraries; promotion & development oftraditional arts & handicrafts;

ix. Measures for the benefit of armed forces veterans, war widows & their dependents;

x. Training to promote rural sports, nationally recognized sports, sports & Olympic sports;

xi. Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development & relief & welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities & women;

xii. Contributions or funds provided to technology incubators located within academic institutions, which are approved by the Central Government;

xiii. Rural development projects, etc

xiv. Slum area development.

Explanation— For the purposes of this item, the term "slum area" shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

However, the CSR Committee shall have authority to decide to carry out any other CSR activities within the purview of permissible activities under the Companies Act, 2013 from timeto time.

CSR COMMITTEES

The Company's CSR governance structure will be headed at the Board level CSR Committee that will be responsible for CSR activities/project undertaken. The Committee will report to the Board of Directors of the Company. The CSR Committee shall comprise of at least three directors, one of whom shall be independent director. The Board shall be empowered to modify the composition of CSR committee, provided that there shall always be at least one independent director as a part of CSR Committee or such other composition as may be prescribed from time to time.

RESPONSIBILITIES OF CSR COMMITTEE

The CSR Committee shall be mainly responsible for:

- Formulating CSR Policy, inter-alia in compliance with the Section 135 of the Companies Act, 2013 and Schedule VII thereof and the Companies (Corporate Social Responsibility Policy) Rules, 2014;
- Identify and recommend to the Board, from time to time, the activities/projects in line with such CSR policy and seeks its approval for expenditure thereon, from the Board of Directors of the Company;
- Put and institute the transparent monitoring mechanism to review the implementation status of each activities/project.
- Recommend to the Board, modifications to the CSR Policy as and when required;
- Formulate a CSR Management Committee, if required to monitor the approved CSR activities, spending thereon from time to time with a robust and transparent governance structure to oversee the implementation of CSR Policy.

MONITORING

1. The Committee shall monitor the projects, activities, and implementation and

execution of the same from time to time and report the same to the Board of Directors on a periodical basis.

2. The Committee shall on completion of every financial year, submit to the board, details of the CSR spent during the financial year and reasons for the actual spent being less than then limits prescribed by the law, if any.
3. The Report of CSR shall form part of Board's Report of the Company.

CSR BUDGET

- The total budget for the CSR activities/projects will be recommended by the CSR Committee and shall be approved by the Board of Directors of the Company.
- The expenditure to be incurred on CSR activities/project during a financial year shall not be less than 2% of the average net profit (calculated in accordance with provisions of section 198of the Companies Act, 2013) during three immediate preceding financial years of the Company.