

CORPORATE SOCIAL RESPONSIBILITY POLICY

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1. CSR Vision:

Standing true to our charter, to develop communities that we operate in, our CSR vision is based on tenets of trust, fairness, and care; and we work towards aligning our efforts in this regard. Following are the keystones are our CSR Philosophy.

- To actively initiate projects and/ or participate in projects that together make us the local lighthouse of the region which significantly improves the lives of the people where we operate and are present.
- Provide vocational training and impart skilling to enhance the livelihood and skills of people who are primarily from the unorganized sector.
- Commit to creating social and economic value as a corporate citizen and encourage employees to participate and contribute to various CSR programmes
- Manage our operations using principles of sustainable development to minimize resource footprint and protect health and safety of all the stakeholders.

2. Scope and Approach:

We believe in responsible growth and thus we will undertake CSR initiatives that will be effective to the communities and the environment in which we operate.

Following are the thrust areas as aligned with the leadership around which the company shall be focusing its CSR initiatives and channelizing the resources on a sustained basis.

- Health and Hygiene: Under Health and Hygiene, we aspire to deliver on primary health care support through infrastructure support, building awareness about hygiene, sanitation, clean habits etc.
- Disaster Management – We contribute towards relief, rehabilitation, and reconstruction activities as a part of our disaster management intervention. We focus towards mitigating the effects of crisis created by natural disasters, pandemic or likewise. This would include partnering with government authorities and local partners to support the communities.

- Enhancing Vocational Skills – In the area of Vocational Training and skilling, we provide specialized and skill-based training to women, to enhance their skills, empower them and enabling them to secure better employment opportunities and thus improve their livelihood.
- Education – Under education, we are working towards enabling initiatives that support in providing education to the children in the communities that we operate in. The interventions include infrastructure building, support with tutoring for children etc.

The CSR areas highlighted in this policy shall be monitored and reviews by the Management, CSR committee and the Board of Directors from time to time. All CSR initiatives/ projects/ programs/ activities will continue to fall under the purview of Schedule VII of the Companies Act, 2013 and Sustainable Development Goals (SDG). The CSR committee may include any other areas of falling within the ambit of Schedule VII of the act, and amendments thereto, from time to time.

The CSR initiatives as previously mentioned will either be one-time initiative or ongoing initiatives of the company and the latter is proposed to be implemented on a continuous basis subject to review and monitoring by the CSR committee and the board.

The approach of the company shall be based on the following principles:

- CSR initiatives to focus on the areas around where the company has its presence and operations.
- CSR initiatives to create awareness amongst employees and ensure their involvement in volunteering; and to develop substantial programs to promote active participation at all levels.
- Company will acquire/ obtain/ provide the expertise required to conduct the above activities and engage with any agencies and third parties of repute, if need arises.
- Company will actively participate in the CSR initiatives through structured programs and projects, and its involvement will be towards participation on the ground. The company will have an internal structure to implement the CSR philosophy under the supervision of the leadership team, CSR committee and the board.

3. Implementation:

The company will undertake the CSR activities, either itself or jointly along with any other companies, and/ or in collaboration with its stakeholder which inter alia, include the Government, the village panchayats, NGOs, local communities, and district authorities.

4. CSR Committee and its Role:

The CSR committee shall comprise of number of members as prescribed under the provisions of the act and CSR Policy rules, 2014. The CSR committee forms shall work in coordination and in accordance with the directors given by the board of directors. The CSR committee members shall be nominated by the leadership team.

Role of CSR committee shall include inter-alia the following:

- Formulate, review and recommended CSR policy to the board for its approval.
- Provide strategy and direction to enrich CSR policy
- Monitor implementation and adherence to the CSR policy
- Approve the budgets for the CSR expenditure
- Formulate and review the annual action plan for each financial year and recommend the same to the board (as needed) for approval.
- Review the impact assessment reports of the CSR projects undertaken.
- Any other activities as decided by the board from time to time.

5. Monitoring/ Review Mechanism:

Internal Monitoring: The following review mechanism shall be followed for the CSR initiatives, which shall ensure a top-down review and delivery.

- The site CSR team (nominated by the Leadership) shall in consultation and through supervision of CSR committee, shall submit the monthly MIS on CSR activities to MD, CFO and Company Secretary.
- The CSR committee shall periodically review and monitor the CSR expenditure vis-à-vis Annual action plan. Additionally, the site CSR team shall obtain feedback from the beneficiaries about the program and shall share the same with the CSR committee as a part of the progress report, time to time.
- The board shall, on a periodic basis, monitor the implementation of on-going projects with reference to the approved timelines and year wise allocation.
- The Site head shall certify on the utilization of the funds allocated for the CSR projects for the financial year, to the CFO.
- Regular internal audits, as recommended and needed, shall be conducted.

The CSR committee shall be responsible for overseeing the planning, coordination and implementation of CSR activities and compliance of the same shall be reported to the stakeholders through the company's annual report on CSR.

External Monitoring:

- Periodic fields visit by the Company representatives.
- Impact assessment reports of the CSR projects – To ensure steady progress and proper utilization of CSR amount against the goals and objectives of the project, following actions would be undertaken:
 - Obtain Utilization certification from the partners at the end of the financial year's
 - Conduct third party independent audit, as and when required

6. Amendment to the Policy:

The company is committed to continuously reviewing and updating its policies and procedures. Any amendment made to this policy would be approved by the Board of Directors.