	Corporate Social Responsibility Policy
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I. AIMS AND OBJECTIVES

The Company intends to make a positive difference to society and contribute its share towards the betterment of society and areas in which the Company operates. The Company aims to create educated, healthy, sustainable and culturally vibrant communities and to contribute as a company to various charitable causes and participate in ways that touch peoples' lives in these communities.

In this regard, the CSR policy has been formulated and recommended by the CSR Committee and adopted by the Board of Directors at its meeting held on 19th April, 2022.

II. PURPOSE

This CSR Policy establishes the scope, CSR goals of The Company and Funding and monitoring process. This CSR Policy shall operate as the corporate responsibility policy of The Company for the purposes of Section 135 of the Act and CSR Rules.

III. CONSTITUTION, COMPOSITION AND SCOPE OF CORPORATE SOCIAL RESPONSIBILITY COMMITTEE (CSR COMMITTEE)

(a) Constitution and composition of the CSR Committee:

The CSR Committee of the Company will be comprising 3 (three) Members of the Board. Subject to the requirements of the Act, the Board may increase or decrease the size of the CSR Committee by passing a resolution.

The current composition of CSR Committee is as below:

Sr. No	Name of Director	Designation
1	Mr. Nitin Garg	Chairman
2	Mr. Vikram Vyas	Member
3	Mr. Sanket Sawant	Member

(b) Scope of the CSR Committee:

The CSR Committee has been set up to:-

- Formulate and recommend to the Board CSR Policy which shall indicate the activities to be undertaken by the Company in areas or subject, specified in the Schedule VII to the Act
- Recommend the amount of expenditure to be incurred on the activities.
- Monitor the CSR Policy from time to time

(c) Meeting of the CSR Committees

- The CSR Committee shall meet as frequently as it determines necessary but at least Once annually.
- The CSR Committee shall maintain minutes of each of its meetings.
- The CSR Committee shall review proposed projects and make recommendations to the Board for approval of such projects and allocation of Funding in accordance with the CSR Committee charter.
- The final decision with regards to the acceptance or rejection of a CSR Proposal shall be with the Board.

IV. CORPORATE SOCIAL RESPONSIBILITY ACTIVITIES (Areas of interest)

The Company shall upon the recommendation of its CSR Committee and with necessary approval of the Board, can undertake any of the following activities, as part of its corporate social responsibility initiatives, in areas and subject specified in Schedule VII of the Companies Act 2013;

(a) Areas of Interest:

- (i) Eradicating hunger, poverty and malnutrition, 'promoting health care including 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 vocation 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 faced 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 set-up 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 works of art; setting up public libraries; promotion and development of traditional art and handicrafts;
- (vi) Measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;
- (viii) Contribution to the Prime Minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- (ix) Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian

Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organisation (DRDO), Department of Biotechnology (DBT), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).

- (x) Rural development projects
- (xi) Slum area development.
- (xii) Disaster management, including relief, rehabilitation and reconstruction activities.

CSR activities approved by the CSR Committee through a company established under section 8 of the Act or a registered trust or a registered society or through a company established by the Central Government or State Government or any entity established under an Act of Parliament or a State legislature Companies (Corporate Social Responsibility Policy) Amendment Rules, 2016 notified through notification dated 23rd May, 2016).

(b) The Company may update the above list as per Section 135 and Schedule VII of the Act as amended from time to time.

V. IMPLEMENTATION AND RESOURCES FOR THE CSR ACTIVITIES

CSR activities can be implemented in the following manner:

- (1) The CSR activities shall be undertaken by the Company, as projects or programs or activities (either new or ongoing), excluding activities undertaken in pursuance of its normal course of business.
- (2) The Board of a company may decide to undertake its CSR activities approved by the CSR Committee, through
- (a) A company Neelam Garg Foundation established under section 8 of the Act or a registered trust or a registered society, established by the company, either singly or along with any other company, or
- (b) A Company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government or any entity established under an Act of Parliament or a State legislature.
- (3) Subject to provisions of sub-section (5) of section 135 of the Act, the CSR projects or programs or activities undertaken in India only shall amount to CSR Expenditure.

• Identification of CSR Proposals:

- The CSR funds of the Company may be routed through the Implementing Agency Neelam Garg Foundation, the section 8 Company incorporated under Companies Act, 2013.
- The Company may spend the CSR amount in other manner as specified in policy or Companies Act. In that case the CSR Committee may identify and receive CSR project proposals from Organizations in line with Areas of Interest as set out herein provided:

Approval Process:

Upon receipt of the CSR proposal, the CSR Committee shall evaluate the same in accordance with this policy.

• OUR APPROACH TO IMPLEMENTATION:

We will strive to implement the CSR activities on our own to the extent possible. However, the principal implementor of our CSR activities would include:

- Contribution to Neelam Garg Foundation, section 8 company registered as Implementing Agency for the purpose of CSR
- > Contribution to various funds which are aligned with our Vision and Mission
- Our Approach shall cover activities which are included in the Schedule VII of the Companies Act,2013

VI. MONITORING AND REPORTING MECHANISM

- The CSR Committee will be responsible for the monitoring CSR activities and report to the Board from time to time.
- The Committee will review Projects/Programs covered under CSR activities listed in the scope of activities and approve them for implementation.
- The CSR Committee meetings are held from time to time to ensure that the activities are implemented in adherence to the policy/requirements as per the Companies act 2013.

The CSR Policy on being approved by the Board shall be displayed on the website of the Company and any modifications carried out from time to time shall also be updated on the website of the Company respectively.
