

CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY
For ATUL PROJECTS INDIA PRIVATE LIMITED
CIN :U45200MH2007PTC173576

[Pursuant to clause (o) of sub-section (3) of section 134 of the Act and Rule 9 of the Companies
(Corporate Social Responsibility) Rules, 2014]

1. INTRODUCTION :

Atul Projects India Private Limited has always been committed to the cause of social service since its inception and has repeatedly channelized a part of its resources and activities, such that it positively affects the society socially, ethically and also environmentally. The Company is committed to take up various Corporate Social Responsibility (“CSR”) initiatives and enhance value in the society.

With the commencement of the Companies Act, 2013 constitution of a Corporate Social Responsibility Committee (“CSR Committee”) of the Board and formulation of a Corporate Social Responsibility Policy became a mandatory requirement. Therefore, the Company seeks to formulate a formal CSR Policy which encompasses its philosophy and guides its sustained efforts for undertaking and supporting socially useful programs for the welfare & sustainable development of the society.

2. OBJECTIVE OF CSR POLICY:

The main objective of CSR Policy is to lay down guidelines for Corporate Social Responsibility Activities of **ATUL PROJECTS INDIA PRIVATE LIMITED**. The Policy is formulated in compliance with the requirements of the Companies Act, 2013 and rules made there under.

The objective of the Atul Projects India Private Limited - CSR policy is to “improve the quality of life of the communities we serve through long term value creation for all the stakeholders”.

The projects undertaken will be within the broad framework of Schedule VII of the Companies Act, 2013. The company may utilize its products and services as suitable for its CSR activities. Any surplus arising out of CSR projects or programs or activities shall be re-deployed back into CSR activities and will form a part of the business profits of the company.

3. SCOPE :

The CSR activities of the Company shall include, but not limited to any or all of the sectors/activities as may be prescribed by Schedule VII of the Companies Act, 2013 amended from time to time. Further, the Company will review the sectors/activities from time to time and make additions/ deletions/ clarifications to the above sectors/activities.

In furtherance of its CSR objects, the following are covered under this Policy:

- (a) CSR activities implemented by the Company on its own;
- (b) CSR activities of the Company through an external trust/society.

4. DEFINITIONS:

In this Policy, unless the context otherwise requires:

- a. “Act” shall mean the Companies Act 2013, including any modifications, amendments or reenactment thereof.
- b. “Administrative overheads” means the expenses incurred by the company for ‘general management and administration’ of Corporate Social Responsibility functions in the company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or program.
- c. “Rules” shall mean Companies (Corporate Social Responsibility Policy) Rules, 2014 including any re- enactment, modifications or amendments thereof.
- d. “CSR Policy” shall mean a statement containing the approach and direction given by the board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan;
- e. “Agency” (or Agencies) means any Section 8 Company or a registered trust/society/NGO/institution, performing social services for the benefit of the society and excluding a registered trust/society/NGO/institution/Section 8 Company which is formed by the Company or its holding or subsidiary company/companies.
- f. “Approved Budget” shall mean the total budget as approved by the Board of the Company upon the recommendation of the CSR Committee, which is to be utilized for CSR Projects.
- g. “Board” shall mean the Board of Directors of the Company.
- h. “Company” shall mean Infibeam Avenues Limited and wherever the context requires, shall signify the Company acting through its Board.

- i. “Corporate Social Responsibility (CSR)” means the activities undertaken by a Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the provisions contained in the rules,
- j. “CSR Annual Plan” shall mean the annual plan detailing the CSR expenditure for the year.
- k. “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.
- l. “CSR Officer” shall mean the whole time person engaged by the Company for activities envisaged in the CSR Policy; having due comprehension, understanding, drive and passion for such activities and designated as such.
- m. “CSR Projects” or “Projects” means Corporate Social Responsibility projects/activities/programs/ initiatives, instituted in India, either new or ongoing, and includes, but is not limited to those undertaken by the Board in pursuance of recommendations of the CSR Committee as per the declared CSR Policy of the Company. Projects/activities/ programs/ initiatives undertaken in pursuance of normal course of business of the Company and projects which benefit only the employees of the Company and their families shall not be considered as CSR Projects.
- n. “Financial Year” shall mean the period beginning from 1st April of every year to 31st March of the succeeding year.
- o. “International Organisation” means an organisation notified by the Central Government as an international organisation under section 3 of the United Nations (Privileges and Immunities) Act, 1947 (46 of 1947), to which the provisions of the Schedule to the said Act apply
- p. Net profit” shall mean the net profit of a company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely:-

(i) any profit arising from any overseas branch or branches of the company, whether operated as a separate company or otherwise; and

(ii) any dividend received from other companies in India, which are covered under and complying with the provisions of section 135 of the Act:

Provided that in case of a foreign company covered under these rules, net profit means the net profit of such company as per profit and loss account prepared in terms of clause (a) of sub- section (1) of section 381, read with section 198 of the Act;

- q. “Ongoing Project” means a multi- year project undertaken by a Company in fulfillment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi- year project but whose duration has been extended beyond one year by the board based on reasonable justification;
- r. “Public Authority” means ‘Public Authority’ as defined in clause (h) of section 2 of the Right to Information Act, 2005
- s. “Rules” shall mean the Companies (Corporate Social Responsibility) Rules 2014, including any re- enactment, modifications or amendments thereof.
- t. “Thrust Areas” shall have the meaning as ascribed to them as per point 5 of the Policy.

5. THRUST AREAS:

The Company is eligible to undertake any suitable/rightful activity as specified in Schedule VII of the Act:

- a. Eradicating hunger, poverty and malnutrition:
- Provision of food, nutrition supplement, clothes etc. for the poor, children and other deprived sections of the society.
 - Supporting nutrition in anganwadi centres and building capacities of anganwadi workers to this effect.
 - Provision of shelter for homeless.
 - Promoting sanitation (including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation), making available safe drinking water
- b. Promoting Health care including Preventive Health care through awareness programmes, health check-ups, provision of medicine & treatment facilities, providing pre-natal & post-natal healthcare facilities, prevention of female foeticide through awareness creation, program for preventing diseases and building immunity.
- c. Ensuring environmental sustainability and ecological balance through:
- Plantation drives in schools, villages, our manufacturing units & offices/business premises and other areas in general;
 - Reviving endangered plants, promoting agro-forestry;
 - Protection of flora & fauna;
 - Conservation of natural resources

- Maintaining quality of soil, air & water (including contribution to the Clean Ganga Fund setup by the Central Government for rejuvenation of river Ganga).
 - Adoption of wastelands to cultivate plants;
 - Promoting biodiversity;
 - Animal welfare and veterinary services.
 - Technical support and Knowhow for improving farming and building capacities of small farmers.
 - Promoting alternate energy resources.
- d. Employment and livelihood enhancing vocational skills and projects including tailoring, beautician, mehendi application, bee keeping, food processing and preservation, vermicomposting and other Life Skill Training and livelihood enhancement projects.
- e. Promotion of education especially among children, women, elderly and the differently abled including:
- Non-formal education programmes.
 - Supporting schools with infrastructure like benches, toilets, potable water, fans etc.
 - Supporting other educational institutions.
 - Improving educational facilities in general.
 - Supporting children for higher education.
- f. Promoting gender equality and empowering women including:
- Adult literacy for women.
 - Promoting and providing credit support to women's self-help and joint liability groups.
 - Training in vocations pursued by women.
 - Setting up homes for women & orphans;
 - Setting up old-age homes & other facilities for senior citizens Setting up hostels for working and student women, day care centers for kids of working women
- g. Rural Development Projects.
- h. Other Activities:
- Promotion of Sports with special focus on training for rural sports, nationally recognized sports, Paralympic sports, Olympic sports.
 - Welfare for differently disabled persons
 - Setting up public libraries
 - Reducing inequalities faced by the socially and economically backward groups
 - Protection of national heritage, art, culture and handicraft; Restoration of Buildings & sites of historical importance & works of art.

- Welfare of armed forces veterans, war widows and their dependants, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows
- i. Employing people and incurring other costs to carry out aforesaid activities.
 - j. Such other activities as the Board may consider to be appropriate.
 - k. Slum area development. ('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)
13. Disaster management, including relief, rehabilitation and reconstruction activities.

6. THE COMPOSITION OF THE CSR COMMITTEE:

Pursuant to the provisions of Section 135 of the Act, the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The Members of CSR shall be appointed by the Board of Directors of the Company which must consist of at least two or more Directors. Accordingly, the constitution of CSR Committee formed by Company is as follows:

Sr. No.	Name of the Director	Designation
1.	Mr. Atul Nathalal Patel	Chairman of the Committee
2.	Mr. Aayush A Patel	Member of the Committee
3.	Mr. Aakash Patel	Member of the Committee

7. IDENTIFICATION OF CSR PROJECT:

1. CSR Projects need to be identified and planned for approval of the CSR Committee, in particular in Thrust Areas, with estimated expenditure and phase wise implementation schedules
2. The Company shall ensure that in identifying its CSR Projects, preference shall be given to the local area and areas around which the Company (including its Units) operates. However, this shall not bar the Company from pursuing its CSR objects in other areas.
3. As a cardinal principle, the CSR Projects in Thrust Areas, shall be identified on the basis of a detailed assessment survey.
4. The CSR Officer may engage external professionals/firms/agencies if required, for the purpose of identification of CSR Projects.

8. IMPLEMENTATION OF CSR PROJECT:

The Company shall implement the identified CSR Project by the following means:

- CSR program will be undertaken by the Company within the defined ambit of CSR policy.
- The time period/duration over which a particular program will be spread, will depend on its nature, extent of coverage and the intended impact of the program
- The mode of implementation of CSR programs will include a combination of direct implementation and implementation through partners such as NGOs, business partners, registered societies etc. The Company will select its partners after appropriate due diligence.
- The Company will use services of expert agencies, consultancy firms etc. wherever required for carrying out surveys, guidance on project design and implementation, impact assessment surveys etc.
- A company may engage international organizations, expert agencies, consulting firms for designing, monitoring and evaluation of the CSR projects or programs as per its CSR policy as well as for capacity building of their own personnel for CSR.
- The Company will make sure that the funds so disbursed have been utilized for the purposes and in the manner as approved by it
- In case of ongoing project, the Board will monitor the implementation of the project with reference to the approved timelines and year- wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period

9. CSR EXPENDITURE

- The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year.
- Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
- If the company spends an amount in excess of requirement provided i.e. 2 (Two) % of Average of net profits of the company made during the three immediately preceding financial years, such excess amount may be set off against the requirement to spend up to immediate succeeding three financial years subject to the conditions that –

- (i) the excess amount available for set off shall not include the surplus arising out of the CSR activities
 - (ii) The Board of the company shall pass a resolution to that effect.
- The CSR Amount may also be spent for creation or acquisition of a capital asset, which shall be held by:
 - (i) a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number, or,
 - (ii) beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities, or,
 - (iii) a public authority.

Provided that any capital asset created by a company prior to the commencement of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, shall within a period of one hundred and eighty days from such commencement comply with the requirement of this rule, which may be extended by a further period of not more than ninety days with the approval of the Board based on reasonable justification.

10. MONITORING:

- i. Monitoring process for CSR Projects shall include the following:
 - Evaluation of Planned progress V/s Actual Progress
 - Actual expenditure V/s expenditure as per Approved Budget
- ii. The Company, in every Financial Year, shall endeavor to spend the feasible amount, which shall not be restricted by the statutory limit of a specified percentage of its average net profits of the immediately preceding three Financial Years. However, the aforementioned expenditure in any Financial Year shall be at least 2% of Company's average Net profits for the three immediately preceding three Financial Years.
- iii. The CSR Committee shall prepare a CSR Annual Plan for the above which shall include:
 - a. Identified CSR Projects
 - b. CSR expenditure
 - c. Implementation Schedules
- iv. Total expenditure in the CSR Annual Plan shall be approved by the Board upon recommendation by the CSR Committee.
- v. In case the Company fails to spend the statutory minimum limit of 2% of Company's average net profits of the immediately preceding three years, in any given financial year, the Board shall specify the reasons for the same in its Director's Report of respective financial year in terms of clause (o) of sub- section (3) of section 134.

- vi. The CSR Committee shall ensure that major portion of the CSR expenditure in the Annual Plan shall be for the Projects in the Thrust Areas. However, there shall not be any preference given to any particular Thrust Area for budgetary allocation and it shall be made purely as per the identified CSR Projects on need basis.

11. DUTIES AND RESPONSIBILITIES:

A. Board of Directors

The Board's Report of a company shall include an Annual Report on CSR Projects as per the format provided in the Annexure to the Rules.

B. CSR Committee

- a) The CSR Committee shall monitor the implementation of the CSR Policy and CSR Plan. For this purpose, the CSR Committee shall meet at least once in a year and as and when required.
- b) In discharge of CSR functions of the Company, the CSR Committee shall be directly responsible to the Board for any act that may be required to be done by the CSR Committee in furtherance of its statutory obligations, or as required by the Board.
- c) The CSR Committee shall place before the Board the draft annual report as per the annexure prescribed under the Rules for finalization.
- d) The CSR Committee shall place before the Board a responsibility statement of the CSR Committee that the implementation and monitoring of CSR Policy, is in compliance with CSR objectives and Policy of the company for inclusion in the Board's Report.
- e) The CSR Committee shall ensure that the Composition of CSR Committee, CSR Policy and Projects approved by the Board is displayed on the Company's website.
- f) The CSR Committee, until a fund is specified in Schedule VII for the purposes of subsection (5) and (6) of section 135 of the Act, the unspent CSR amount, if any, shall be transferred by the company to any fund included in schedule VII of the Act.

C. CSR Officer

- a) The CSR Officer shall be responsible for the proper implementation and execution of CSR Projects of the Company.

- b) The CSR Officer shall be responsible for monitoring the Projects vis- a - vis the Annual Plan.
- c) The CSR Officer shall send CSR Annual Plan and the draft Annual Report as per the format in Rules.
- d) The CSR Officer shall communicate the relevant feedbacks received by him/her to the CSR Committee.
- e) The CSR Officer shall be directly responsible to the CSR Committee for any act that may be required to be done by the CSR Committee in accordance with the Policy.
- f) The CSR Officer shall be assisted by a select group of individuals who shall be exclusively dedicated and/or available on priority basis to the CSR Officer, including in Units, as and when required in discharge of all or any of his functions as required under the CSR Policy.

12. REVIEW PERIODICITY AND AMENDMENT:

- a) CSR Plan may be revised/modified/amended by the CSR Committee at such intervals as it may deem fit in consultation with Board.
 - b) The CSR Committee shall review the Policy from time to time unless such revision is necessitated earlier.
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