

CORPORATE SOCIAL RESPONSIBILITY POLICY

APPLICABILITY

This Corporate Social Responsibility (CSR) Policy is applicable to Eldeco Infrastructure and Properties Limited (hereinafter referred to as “the Company”), which is mandated with the CSR expenditure obligations as per Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

GUIDING PRINCIPLE

The Company being a corporate entity falling within the purview of Section 135(1) of the Companies Act, 2013 (“the Act”), has established a Corporate Social Responsibility Committee (“CSR Committee” or “the Committee”). The CSR Committee, constituted by the Board of Directors of the Company (“Board”) has, in exercise of its authority and discharge of its responsibility, under Section 135 of the Act read with Companies (Corporate Social Responsibility Policy) Rules 2014, formulated a CSR Policy, which has been approved by the Board as the Corporate Social Responsibility Policy (“CSR Policy”) of the Company. The CSR Policy shall encompass the guiding principles and rules that shall be applicable to the Corporate Social Responsibility initiatives, programmes and activities (“CSR activities”) that the Company will undertake as per the Schedule VII of the Act (as amended from time to time).

This document is in keeping with the current maturity of the Company and is expected to evolve with the growth of the Company, dynamic needs of society and the community in which the company operates.

COMPOSITION OF THE COMMITTEE

The CSR Committee shall be formed as per the applicable laws and the Committee shall be responsible for the implementation/monitoring and review of this policy and various projects/activities undertaken under this policy. The CSR Committee shall submit periodical reports to the board of directors.

RESPONSIBILITY OF THE COMMITTEE

The Corporate Social Responsibility Committee shall:

- a) formulate and recommend to the Board, a CSR Policy which shall indicate the activities to be undertaken by the company in areas or subject, specified in Schedule VII;
- b) recommend the amount of expenditure to be incurred on the activities referred to in clause and
- c) monitor the CSR Policy of the company from time to time.

Eldeco Infrastructure & Properties Ltd.

DEFINITIONS

1. "Act" means the Companies Act, 2013
2. "Corporate Social Responsibility (CSR)" means and includes but is not limited to :-
 - (i) Projects or programs relating to activities 1[areas or subjects] specified in Schedule VII to the Act; or
 - (ii) Projects or programs relating to activities undertaken by the board of directors of a company (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 [include activities, areas or subjects] specified in Schedule VII of the Act.
3. **Committee** means the Corporate Social Responsibility Committee as constituted for the purpose, by the Board of Directors of the Company.
4. "**Company**": means Eldeco Infrastructure and Properties Limited
5. '**Net Profit**' means the net profit computed for a financial year in accordance with the Section 135 read with Section 198 of Act, 2013 and other applicable provisions of the Act, as amended from time, not being profit arising from any overseas Branch of the Company and/or any dividend income accruing to the Company in any financial year excluding the surplus arising out of CSR Activities, if any.

CSR ACTIVITIES (CSR ACTIVITIES)

CSR activities mean any one or more of the following objectives/ purposes, as required under Schedule VII of the Act, being pursued/undertaken/to be undertaken by the Company, either directly or in through companies established under section 8 of the Act, registered trusts or registered society, establishment by the Company, its subsidiary, holding or associate, or in collaboration with any other company for the purpose of undertaking similar programs or projects, within the purview of CSR Rules and such other circulars/notifications so issued:

- (i) Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care along with providing financial help to NGOs for clinical research works, 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 and providing scholarships to at least 100 meritorious but poor students.
- (iii) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres, to take care of daily basic necessities and entertainment 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, agro-forestry, 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 arts and handicrafts;
- (vi) Measure the benefit of armed forces/police/defence war widows and their dependents, including lifelong pension programmes for their wives and dependents.
- (vii) Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports by providing funds for organizing of different tournaments.
- (viii) Contribution to the Prime Minister's National Relief Fund or any other fund set up by the Central Government for socio-economic development and relief and welfare of the scheduled castes, the schedule tribes, other backward classes, minorities and women; contribution to the fund set up for the purpose of the mitigating natural calamities.
- (ix) Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- (x) Rural Development projects.
- (xi) Slum area Development
- (xii) Any other activity which the company deems necessary for the upliftment and advancement of society and economy.

Explanation:-For the purposes of item No. (xi) 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.

FUND ALLOCATION

- (i) For achieving its CSR objectives through implementation of meaningful & sustainable CSR activities, the Company will allocate 2% of its average net profits made during the three immediately preceding financial years as its Annual Cost Budget.
- (ii) All the direct/indirect expenses incurred by the Company for the approved CSR activities will be accounted as the CSR Expenditure of the Company.
- (iii) Any surplus arising from any CSR activities shall not form part of the business profit of the Company.

FUNCTIONING OF THE COMMITTEE

The Committee shall work within the ambit of Section 135 of the Companies Act, 2013 read with Schedule VII of the Act and Companies (Corporate Social Responsibility Policy) Rules, 2014. The Committee, towards effectuation and implementation of the CSR Activities, shall identify and recommend the specific CSR activity(ies), to the Board of Directors of the Company (Board) for its consideration and approval. Based on the approval of the Board, required funds shall be infused into the Board approved CSR activities.

The Committee shall institute a "transparent monitoring mechanism" for implementation of the CSR activities, towards which end, progress updates on CSR activities undertaken, shall be submitted to the Board, from time to time.

OVERALL IMPROVEMENT IN FUNCTIONING AND IN DISCHARGE OF CSR

The Committee shall from time to time explore the ways and means whereby improvements that need to be brought about, towards the discharge of CSR by the Company are identified and steps taken to ensure that measures necessary to effectuate the areas of improvement so identified are taken in the right earnest.

REPORTING / DISCLOSURE

The regulatory disclosure requirements also need to be complied in relation to CSR activities of the Company.

- Composition of the CSR Committee shall be disclosed in the Board Report;
- The Board Report shall include an annual report on CSR activities in prescribed format (by MCA) containing specified particulars i.e. Brief Outline of CSR Policy, its content the Average Net Profit for the last 3 FYs and the prescribed CSR Expenditures etc.;
- If the company fails to spend the prescribed amount, the Board shall, in its report specify the reasons for not spending the amount; and
- The content of Corporate Social Responsibility (CSR) Policy shall be displayed on the company's website, if any.

Format of Reporting for Directors' Report: As per **Annexure – 1**

GENERAL

Any term or aspect not specifically defined or set out in this Policy shall be construed to mean what is laid down in respect thereof under the Companies Act, 2013 or the Corporate Social Responsibility Rules.

POLICY REVIEW

The CSR Policy of the Company will be reviewed on the following basis:

- (i) The Company may review the policy at least on an annual basis with respect to the legislative changes or other circumstances.
- (ii) The Board of the Directors will revise, amend or modify this policy based on the recommendations of the CSR committee to conform to any revision/amendment, to be made to the CSR Rules or any other provisions of the act as may be applicable.

FORMAT

ANNUAL REPORT ON CSR ACTIVITIES TO BE INCLUDED IN THE BOARD'S REPORT

1. A brief outline of the Company's CSR policy, including overview of projects or programs proposed to be undertaken and a reference to the web- link to the CSR policy and projects and programs.
2. The Composition of the CSR Committee
3. Average Net Profit of the Company for the last three financial years
4. Prescribed CSR expenditure (Two percent of the amount as in the item 3 above)
5. Details of the CSR spent during the financial year:
 - a) Total amount to be spent for the financial year:
 - b) Amount unspent:
 - c) Manner in which the amount is spent during the financial year is detailed below:

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
S. No.	CSR project or activity identified	Sector in which the project is covered	Projects or programs (1) Local area or other (2) Specify the state and district where projects or programs was undertaken	Amount outlay (budget) project or programs wise	Amount spent on the projects or programs Sub heads: (1) Direct expenditure on projects or programs (2) Overheads:	Cumulative expenditure upto the reporting period	Amount spent Direct or through implementing agency
1.							
2.							
3.							

6. In case the Company has failed to spent the two-percent of the average net profit of the last three financial years or any part thereof, the company shall provide the reasons for not spending the amount in its Board report.
7. 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.

Sd/-
Chairman cum Managing Director

Sd/-
Chairman of CSR Committee

Eldeco Infrastructure & Properties Ltd.