

DARASHAW & COMPANY PRIVATE LIMITED

CORPORATE SOCIAL RESPONSIBILITY POLICY

Preface

Corporate Social Responsibility (CSR) is the way and mean through which corporates can repay the obligations made by the Society by contributing the resources in its various forms as required for the efficient operation of the Business. Corporate Social Responsibility is strongly connected with the principles of sustainability. Organization should make decisions based not only on financial or operational factors, but also on the social and environmental consequences. Therefore, it is the core corporate responsibility of the Company to practice its corporate values through its commitment to grow in a socially and environmentally responsible way, while meeting the interests of its stakeholders.

Legal Framework

This Corporate Social Responsibility Policy (“the CSR Policy”) has been framed by Darashaw & Company Private Limited (the Company) in accordance with the Section 135, Schedule VII of the Companies Act, 2013 and CSR Rules issued by the Ministry of Corporate Affairs on February 27, 2014. Unless the context otherwise requires, the definitions mentioned in the notification dated February 27, 2014 and Companies Act 2013, shall apply to this CSR Policy.

Concept and Vision for CSR Policy:

Darashaw & Company Private Limited has put earnest efforts to be responsible Corporate Citizen and help make a positive contribution to the society and environment. This helps develop strong relationships with stakeholders, and create long-term value for society and business. The Company also believes in the trusteeship concept. This requires transcending business interests and working towards making a meaningful difference to the society. In pursuit to achieve vision and fulfil commitment to be a socially responsible corporate citizen, the Corporate Social Responsibility (CSR) Policy has been formulated which encompasses the Company's ideology, reasoning and agency for undertaking and supporting socially useful programs for welfare and sustainable development of the community at large.

CSR Policy Objectives

The main objectives of Darashaw & Company Private Limited's CSR Policy are as follows:

- (i) To nurture Company's mission, for dedicated care, towards the under privileged people around it, for their needs towards education, medical, healthcare, etc.
- (ii) To directly, or indirectly, undertake programmes that would benefit the communities in and around its work centres, over a period of time, in enhancing the quality of life and economic well-being of the local populace.
- (iii) To generate, through CSR initiatives, a community goodwill for the Company and help reinforce a positive and socially responsible image of Darashaw & Company Private Limited, as a corporate entity.

Governance Structure

The Board of Directors will form a CSR Committee*, comprising of three directors, in pursuance of the CSR provisions under the Companies Act, 2013.

The Board may, at its discretion, re-constitute the same, in future, by addition of new committee members or in any other manner, whatsoever.

The CSR Committee shall:

- (i) Formulate and recommend a CSR Policy to the Board, indicating the activities, as specified under Schedule VII of the Act.
- (ii) Recommend the amount of expenditure to be incurred on the selected activities, indicated in the Policy.
- (iii) Monitor the activities undertaken under the CSR policy, at regular intervals.

*The requirement to form a CSR Committee will be subject to the conditions laid down in sub-section (9) of Section 135 of the Companies Act, 2013. If the CSR Committee is not required to be formed, the above mentioned functions will be discharged by the Board of Directors of the Company

CSR Activities:

Pursuant to Schedule VII of the Companies Act, 2013, the Board has approved the following activities as “CSR Activities” to be undertaken under the CSR policy of the Company. The Board of Directors has reviewed the said activities and expressed its consent to pursue the said activities under CSR policy of the Company under section 135 of the Companies Act, 2014, Schedule VII and other applicable rules, regulations, notifications etc., issued/to be issued from time to time.

Approved CSR Activities:

1. Eradicating hunger, poverty and malnutrition, 2[“promoting health care including preventive health care” and sanitation 4[including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation] and making available safe drinking water.
2. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
3. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
4. 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.
5. 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
6. measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows

7. training to promote rural sports, nationally recognised sports, Paralympic sports and Olympic sports
8. contribution to the prime minister's national relief fund 8[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
9. Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defence Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs)
10. Rural development projects
11. Slum area development.
12. Disaster management, including relief, rehabilitation and reconstruction activities.

Budget for CSR Activity& CSR Expenses:

The Company shall allocate the budget for CSR activities. The minimum budgeted amount for a financial year shall be 2% of the average net profit of three immediately preceding financial years. The Company may allocate more funds/amount than the amount prescribed under section 135 of the Companies Act, 2013, for the CSR activities for any financial year. The Board shall calculate the total fund for the CSR activities and approve the total fund to be utilized for CSR activity for respective financial year. CSR expenditure shall include all expenditure including contribution to corpus for projects or programs relating to CSR activities approved by the Board but do not include any expenditure on an item not in conformity or not in line with activities which fall within the approved CSR activities.

Identification of activities/projects:

Out of approved CSR activities, the Board shall decide which activity/project should be given priority for the respective financial year. While arriving at the decision of the activity to be undertaken for the respective year, the Board shall analyse the basic need of the community/ area in which the Organisation operates or at the place where its registered office is situated. The Board shall record its findings and prioritised the CSR activities

Implementation process:

The approved CSR programme/Activities will be monitored and implemented, but not limited to, in the following manner:

- a) Directly or through Darashaw Foundation, or a registered trust, society or Company established by Darashaw Group or its holding, subsidiary or associate Company under section 8 of the Act, or
- b) Any other foundations, trusts, or a section 8 Company (or erstwhile Section 25 Company) or any other form of entity with a track record of at least three years in carrying out activities in related areas. While engaging with partners, the Company will evaluate the credentials of the implementing entity and seek relevant documents, information and details.
- c) The Company may also collaborate with other companies or institutions for undertaking projects or programs for CSR activities.

Organisational Responsibility:

At organisational level for implementation of agreed CSR activity, the Board may constitute an implementation team or authorise any of the Department of the Company to organize for the implementation of the CSR activity. The team or respective department shall monitor the implementation process from time to time, on behalf of the Board and place a report to the Board regarding the progress of the activity implementation, on a quarterly basis. The respective department or implementation team would be responsible for reporting of any irregularity to the Board on immediate basis.

Compliance and Reporting:

The respective department or implementation team is responsible to undertake CSR activities as per the approved CSR Policy. Apart from quarterly reporting to the Board about the implementation of CSR activity, a detail report containing the implementation schedule, total budget allocated, actual expenses incurred, surplus arising, if any, result achieved, further work to do in the concern CSR activity, Recommendation for the CSR activities for next year etc. should be placed before the Board for its consideration. Any surplus arising out of the funds allocated for CSR activity shall not be the part of the business profit of the Company

Management Commitment:

Our Board of Directors, our Management and all of our employees subscribe to the philosophy of compassionate care. We believe and act on an ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy. Our Corporate Social Responsibility policy conforms to the relevant section of the Corporate Social Responsibility, Rules made under Companies Act, 2013 and amendment(s) to be made thereto in future.
