

Objectives

This Corporate Social Responsibility ('CSR') Policy which encompasses the Avichal Buildcon Private Limited's philosophy towards corporate social responsibility, lays down the guidelines and mechanism for undertaking socially relevant programs for sustainable development of the community at large and complying with all the local regulations in that regard, is titled as the 'CSR Policy for Avichal Buildcon Private Limited.'

Avichal Buildcon Private Limited ('the Company' / 'ABPL') is further institutionalizing its commitment at being a socially responsible citizen with an aim of sustainable development of the society. The purpose of this policy is to define the Company's vision for CSR and its guiding principles, governance structures, and strategy and program selections criteria.

Scope

This policy is applicable to all CSR initiatives taken by the Company.

- The Company may have a direct engagement strategy, to be conceptualized and executed directly through a team of professionals or through Dharampal Satyapal foundation or such other Trust / Foundation established by the Company time to time. The Company may also collaborate with other group companies for undertaking projects or programs or CSR activities.
- The Company may decide to undertake its CSR activities approved by the Board of Directors on recommendation of the CSR Committee, through a company 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.

Policy

Preamble

The Company believes in building sustainable communities that are economically, environmentally, and socially healthy and resilient.

It aims / plans to offer integrated solutions to achieve this, and focus on areas such as:

- Education;
- Health Care;
- Livelihood Enhancement & Skill Development;

- Water & Sanitation;
- Environment Conservation; and
- any other relevant programs as per the need of the community for sustainable impact (in the areas or subject, specified in Schedule VII referred to in Section 135 of the Companies Act, 2013).

CSR Vision

To build sustainable communities by leveraging resources & networks.

Guiding Principles

- Integration of indigenous knowledge & culture,
- Promotion of Local economy,
- Conservation of Ecology, and
- Maximization of Community Ownership.

Program Selection Guidelines/ Focus Areas of Engagement

The Company intends to offer integrated solutions for sustainable impact in the field of:

- **Livelihood enhancement** to improve the economic condition of women, farmers and youth by improving skills, facilitating support network and establishing market linkages.
- **Skill Development** to provide the employable skills to the youth through various capacity building programs.
- **Water & Sanitation** to address the challenges of water scarcity through watershed development and rainwater harvesting programs and to improve the safe drinking water & sanitation situation in the community.
- **Education** to provide better quality of education to the needy section the society through schools and after school learning programs.
- **Health care** to provide the basic health services to the remotely & less served people along with preventive measures.
- **Elderly care** to meet the basic requirement of the elderly people.

The Company may also work for the:

- Holistic development of the community through integrated solutions in a particular geographical location.
- The communities, in which it has business footprint, especially youth, farmers, women and children, and other backward and underprivileged are key beneficiaries of the CSR initiatives. Contributing positively to these stakeholders and improving their quality of life will be essential elements of CSR efforts.
- Socially and economically weaker section of the society.

The Company will not contribute any amount directly or indirectly to any political party or any religious organization as part of its CSR activities.

The Company may also from time to time spend in the other need based programs as related to in Schedule VII of the Companies Act 2013.

The Company may engage employees, business experts and other such stakeholders to achieve its CSR vision.

CSR governing body structure

The company has put in place the following governance structure to ensure that CSR policy is implemented and monitored effectively. A Board level Corporate Social Responsibility (CSR) Committee will be formed to develop and review company's CSR strategy and process. A Corporate Social Responsibility (CSR) department has been established by the Company to review & guide the annual business plan, program implementation, monitoring & evaluation and further impact assessment.

Financial Allocations

CSR committee will be allotted funds to the tune of at least 2% of average net profit of company of last three preceding years for the programs mentioned above.

The Board shall approve overall limits for CSR Activities to be undertaken by the Company. Within the overall limits approved by the Board, the CSR Committee shall approve individual projects / programs including contribution towards the Corpus Fund.

All CSR projects / programs under this policy shall be undertaken in India. The CSR Committee shall decide on locations for implementation of the CSR projects / programs.

Any surplus or income arising out of the CSR programs or projects or activities shall not form part of business profit of the Company, and will be invested in CSR activities.

Monitoring & Evaluation Mechanism

The CSR programs will be monitored by the CSR department. CSR department may:

- Appoint agencies or consultants or internal resources for the monitoring purpose.
- Undertake an assessment, as and when needed, in order to evaluate the social impact of its CSR programs on the communities. This will also help the Company to obtain learning, which will help increase program efficiency and scalability.

- After Completion, appoint various independent agencies to evaluate the impact of the program.
- CSR Department will submit quarterly progress reports and periodic evaluation reports (Project tracker as well as Financials) to CSR Committee to review the programs and projects.
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Reporting & Communications

The Company will incorporate the details of CSR activities, including physical and financial processes in the annual report of the company. The CSR activities and CSR expenditure (all expenditure including contribution to corpus, or on projects or programs relating to CSR activities) will also be reflected in the Board's Report/ Annual accounts of the Company under the head 'CSR Expenditure' and will be mentioned in the Director's report.

The Contents of the CSR Policy shall be disclosed in the Board's report and displayed at the Company's Website.

The Company will communicate its CSR initiatives and efforts to all stakeholders through e-mailers, website and other appropriate communications channels.