

DISCLAIMER

****THE POLICY DISPLAYED WAS APPROVED BY THE ERSTWHILE CORPORATE SOCIAL RESPONSIBILITY COMMITTEE OF BOARD OF DIRECTORS OF THE COMPANY IN ITS MEETING HELD ON 06 FEBRUARY 2016, PRIOR TO INITIATION OF CORPORATE INSOLVENCY RESOLUTION PROCESS UNDER THE PROVISIONS OF INSOLVENCY & BANKRUPTCY CODE, 2016. THIS POLICY HAS BEEN PUBLISHED ON THE WEBSITE OF THE COMPANY TO COMPLY WITH SECTION 135(4)(A) READ WITH RULE 9 OF COMPANIES (CORPORATE SOCIAL RESPONSIBILITY POLICY) RULES, 2014. IMPLEMENTATION OF THE POLICY, IF APPLICABLE AND PUBLICATION OF AN UPDATED VERSION OF THE POLICY, AS CONSIDERED AND APPROVED BY THE NEW BOARD OF DIRECTORS WILL BE MADE ONCE THE NEW BOARD OF DIRECTORS IS APPOINTED.**

CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Objective:

“Corporate Social Responsibility (CSR”) means and includes but is not limited to:- (i) Projects or programs relating to activities 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 conditions that such policy will cover subjects enumerated in Schedule VII of the Act.”

The Corporate Social Responsibility Policy (“CSR Policy”) focuses on addressing critical social, environmental and economic needs of the marginalized/underprivileged sections of the society. We adopt an approach that integrates the solutions to these problems into the strategies of the company to benefit the communities at large and create social and environmental impact.

2. Governance Structure:

Our CSR governance structure will be headed by the Board Level CSR committee that will be ultimately responsible for the CSR projects undertaken. The committee will report to our Board of Directors

The Members of the Committee are:

Mr. Dinesh Mittal

Mr. Javed Akhtar

Mr. Gaurang Shetty

3. Responsibilities

- Formulate and update our CSR Policy, which will be approved by the Board of the Company.
- Approve projects that are in line with the CSR policy.
- Put monitoring mechanisms in place to track the progress of each project.
- Recommend the CSR expenditure to the Board of the Company who will approve it.
- The total budget for the CSR projects will be decided by the CSR Committee in consultation with the Management.

4. Focus Areas

Hunger, Poverty, Malnutrition and Health: eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation “including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.

Education: promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.

Women and Senior Citizen: 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.

Environment: 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 setup by the Central Government for rejuvenation of river Ganga.

National Heritage and Culture: 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 and handicrafts.

Armed Forces: measures for the benefit of armed forces veterans, war widows and their dependents.

Sports: training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports.

Contribution to government fund: 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 Scheduled Tribes, other backward classes, minorities and women.

Academic: contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government.

Rural Development: to undertake rural development projects.

Slum Area: to undertake slum area development.

'slum area' shall mean any area declared as such by the Central Government or State Government or any competent authority under any law for the time being in force.

5. Undertaking of CSR Activities:

The Company will undertake the CSR activities through such entity / organization as approved by the CSR Committee.

The surplus arising out of CSR activities, projects or programs shall not form part of the business profits of the Company.

The location of the CSR activities shall be decided by CSR Committee.