

CORPORATE SOCIAL RESPONSIBILITY POLICY

The Board of Directors (the “**Board**”) of **Gefran India Private Limited** (the “**Company**”) acting has adopted the following policy and procedures with regard to the Company’s Social Responsibility:

❖ Vision and Policy Statement:

Corporate Social Responsibility (CSR) is the company’s contribution to social and economic development of the local community in which we operate and to society at large. We commit to spend a minimum 2% of the average net profit of the preceding three financial years on CSR activities. The Board of Directors of the Company through its CSR committee ; if applicable , will plan and monitor the expenditure of CSR activities.

The Board and/or The CSR Committee if applicable, will annually recommend the CSR programmes and project to the Boards of its approval. The activities undertaken in the normal course of business will not be a part of CSR activities.

❖ Applicability:

This CSR policy has been formulated in consonance with Section 135 of the Companies Act 2013 read with CSR Rules notified by the Ministry of Corporate Affairs, Government of India, from time to time. This Policy shall apply to all CSR projects/programmes undertaken by the company in India as per the Schedule VII of the Companies Act, 2013. This Policy will be applicable to **Gefran India Private Limited**

❖ CSR Budget:

The Board and/or The CSR Committee if applicable, will recommend the annual budgeted expenditure project wise or any ongoing project(s) to the Board for its consideration and approval.

❖ CSR Programmes and Projects

The Company shall undertake any of the following Activities/Projects or such other activities/projects as may be notified by the Ministry of Corporate Affairs from time to time as a part of the Corporate Social Responsibility (“**CSR**”):

- i. Eradicating hunger, poverty and malnutrition, promoting preventive health care and 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;

- iii. Promoting gender equality, empowering women, setting up homes and hostels for women and orphans, setting up old age homes, day care centers 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, agroforestry, conservation of natural resources and maintaining quality of soil, air and water;
- 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;
- vi. Promotion and development of traditional arts and handicrafts;
- vii. Measures for the benefit of armed forces veterans, war widows and their dependents;
- viii. Training to promote rural sports, nationally recognised sports, Paralympic and Olympic sports;
- ix. 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;
- x. Contribution or funds provided to technology incubators located within academic institution which are approved by the Central Government;
- xi. Rural development projects;
- xii. Any other activities in relation of the above and all other activities which forms part of CSR as per Schedule VII of the Act, 2013 (the "Act") as amended from time to time.

(Collectively hereinafter referred to as "**CSR Activities**")

The CSR Activities shall be undertaken only in India for the benefit of the public and not only for the employees of the Company and their family. Provided that the preference shall be given to the local areas and areas where the Company operates for undertaking the CSR Activities. The Companies CSR projects and programmes will be implemented through public charitable trust, not for profit companies set up under section 25 of the Companies Act, 1956 (corresponding to Section 8 of the companies Act, 2013) through recognized and reputed NGOs and similar entities.

❖ **Implementation of CSR Activities**

- i. The Company may undertake CSR Activities through itself or a registered trust or society or any company, established by the Company, its holding or subsidiary company under Section 8 of the Act for such not-for-profit objectives.

Provided that the Company can carry out the CSR Activities through such other institutes having an established track record of 3 (three) years in undertaking the CSR Activities.

ii. The Company may collaborate with other companies for undertaking the CSR Activities subject to fulfilment of separate reporting requirements as prescribed in the Companies (Corporate Social Responsibility Policy) Rules, 2014 (the “Rules”).

iii. The CSR Activities shall not include any activity undertaken by the Company in pursuance of normal course of business of the Company.

iv. The Company shall not make any payment directly or indirectly to Political Party (ies) for CSR Activities.

❖ **Procedure for CSR Activities**

i. The Board and/or The CSR Committee if applicable, shall recommend the Board suitable CSR Activities to be undertaken during for the financial year along with the detailed plan, modalities of execution, implementation schedule, monitoring process and amount to be incurred on such activities;

ii. The Board shall give its approval based on the recommendation of the Committee, if applicable and in compliance of this Policy;

iii. The Committee, if applicable , after approval, may submit the report giving status of the CSR activities undertaken, Expenditure Incurred and such other details as may be required by the Board.

❖ **Composition**

In compliance with the rules laid down under the Companies Act 2013, the composition of the CSR Committee, if applicable shall be formed in pursuant to provision of the Companies Act, 2013

Since the CSR Expenditure Liability under Section 135 (5) of the Company for the year is not exceeding INR. 50 Lakhs, the Company is not required to form CSR Committee and the Board of Directors shall carry out the functions of CSR Committee.

❖ **Role of the Committee**

The Committee , if applicable shall carry out of the following functions:

(a) recommend the CSR Policy to the Board;

(b) identify the projects/activities to be undertaken by the Company for CSR

(c) recommend to the Board CSR Activities to be undertaken along with detailed plan, modalities of execution, implementation schedule, monitoring process and amount to be incurred on such activities;

(d) monitor the CSR Policy of the Company from time to time;

(e) ensure compliance of CSR Policy and the Rules;

(f) such other functions as may be delegated and/or assigned by the Board from time to time.

Words and expressions used and not defined in this Policy shall have the same meanings respectively assigned to them in the Act and the Rules.

❖ **Frequency of Meetings:**

The Committee ,if applicable shall meet at least once in a Financial Year.

❖ **Reporting, Evaluation and Documentation:**

- The Budget for CSR initiatives shall be prepared in accordance with section 135 of the Companies Act 2013, or other statutory enactment
- CSR Projects will be undertaken based on the best possible extent by the Board or on the recommendation of the CSR Committee , if applicable , within the defined thrust areas.
- Project support will depend on the scale of the project and its feasibility. The Board or The CSR Committee , if applicable will evaluate the project progress.
- The CSR report shall also be included in the Board's report as required by the Companies Act 2013.
- Surplus arising out of CSR activity, if any, will not form part of business profits of the Company.
- The Corpus of the CSR Policy will include-
 - a) 2% of the average net profit of the proceeding three years.
 - b) Any income arising therefrom
 - c) Surplus arising out of the above activities;
- All CSR activities covered under the policy shall be carried out within India.

❖ **Review of the Policy:**

The Board or The CSR Committee , if applicable , shall review the CSR Policy periodically and make revisions to the same with the approval of the Board.