

**CORPORATE
SOCIAL
RESPONSIBILITY (CSR) POLICY
OF
GARGI HÜTTENES-ALBERTUS PRIVATE LIMITED**

1. Introduction

At Gargi Hüttenes Albertus Private Limited, the Corporate Social Responsibility (CSR) has been an integral part of the way we have been doing our business since inception. For more than 30 years, the Company's CSR initiatives has played pivotal role in improving the lives of the communities and society at large and in & around our operations with an objective to energize, involve and enable them to realize their potential. This has also enabled us to fulfill our commitment to be a socially responsible corporate citizen.

2. Objective

The objectives of CSR policy are:

- To frame guiding principles for selection, implementation and monitoring of CSR activities.
- To formulate annual action plan of the Company's CSR Activities.
- To ensure the CSR Activities comply with the provisions of Section 135 of the Companies Act read with the rules thereunder, as may be amended from time to time.

3. CSR Activities

The scope of the CSR activities of the Company will cover the following areas but not limited to the same and may extend to other specific projects/ programs as permitted under the law from time to time.

Sr.No.	Area	Activities/Initiatives/Programs
1	Eradicating hunger, poverty and malnutrition	Providing Food, Better Cotton Initiatives
2	Promoting health care including preventive healthcare and sanitation	Health and Sanitation Development programs, medical camps, programs for

		HIV Aids, Cancer etc. and providing financial help to the patients.
3	Providing safe drinking water	Drinking water programs, construction of dams, ponds, links, channels, wells and water storage tanks.
4	Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently-abled and livelihood enhancement projects;	Construction and running of schools and libraries, vocational training and special education institutes, providing financial assistance and scholarships for higher education. Undertaking and skills and entrepreneurship programs. Providing school uniforms and holding various creative competitions in schools.
5	Women Empowerment and Facilities for Senior Citizens	Setting up centers and institutions for women & senior citizenship. Promoting income generating activities amongst women.
6	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;	Horticulture plantation, water resource management and soil conservation, Rain water harvesting, etc.
7	Training to promote rural sports, nationally recognized sports, paralympic sports and	Projects/programs promoting various sports activities

	Olympic sports;	
8	Contribution/Financial Assistance	Contribution to 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;

4. Exclusion from CSR

The following activity shall not form part of the CSR activities of the Company:-

- The activities undertaken in pursuance of normal course of business of a company.
- CSR projects/programs or activities that benefiting employees of the Company as defined in clause (k) of Section 2 of the Code on Wages, 2019.
- Any contribution directly/indirectly to political party or any funds directed towards political parties or political causes under Section 182 of the Act.
- Any CSR projects/programs or activities undertaken outside India.
- Activities supported on sponsorship basis for deriving marketing benefits for its products and services.
- Activities carried out for fulfilment of any other statutory obligations under any law in force in India.

5. CSR Committee

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 the policy. The CSR Committee shall submit periodical reports to the board of directors.

6. CSR Projects

- The Company will encourage voluntary efforts of its directors and employees to CSR Projects. The Company also encourages its directors and employees to recommend to the CSR Committee meaningful projects in accordance with the Guiding Principles that may be taken up by the Company, under the supervision of the CSR Committee.
- In addition to Projects that may be taken up by the Company directly, the Company may also collaborate with other companies or entities, including its group companies, to carry out any CSR Projects, in accordance with this Policy.
- The investment in CSR projects shall be project-based with specific timeframes.
- As far as possible, the Company shall strive to create self-sustainability in its CSR efforts, that is to say, over a long run, a CSR Project should be able to generate sufficient resources, whether by way of profits or by way of a regular flow of contributions, so that it does not have to depend on the Company's contribution on a regular basis.
- The progress of all CSR Projects, including the spending thereon, shall be periodically reviewed by the CSR Committee.

7. Priority Projects

The Company has currently identified the following Priority Projects to be undertaken by the CSR Committee–

- Promoting education including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently-abled and livelihood enhancement projects. Providing School uniforms and holding various creative competitions in the schools around our factory / offices.
- Promoting health care including preventive health care and sanitation and making available safe drinking water.

- 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.
- Eradicating hunger, poverty and malnutrition, [promoting health care including preventive health care] and sanitation and making available safe drinking water.
- Promoting gender equality, empowering women, Setting up homes, hostels for women and orphans, setting up old age homes, day care centres and such other facilities for senior citizens, promoting income generating activities amongst women.

Notwithstanding the listing of the Priority Projects, the CSR Committee may accept CSR Projects falling within the activities listed out in Schedule VII of the Companies Act, 2013. Company may also collaborate with other Companies for undertaking projects or programs or CSR activities in such as manner as provided in the CSR Rules as amended from time to time.

8. Carrying out of CSR Projects through external agencies

In case the CSR Committee decides to execute a CSR Project through an external agency, such as a Company established under Section 8 of the Act, registered trust, society or NGO (“Agency”), it would adhere to the following guiding principles:

1. The Agency must be a Company established under Section 8 of the Act or a registered public trust or a registered society, registered under Section 12A & 80G of the Income Tax Act, 1961; or
2. The Agency established under Section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
3. Any entity established under the Act of Parliament or a State Legislature; or
4. The Agency established under Section 8 of the Act, registered under Section 12A & 80G of the Income Tax Act, 1961 and having track record of at least three (3) years in undertaking similar activities. In case, any director of the Company or his / her relative, may be associated / affiliated as a trustee, governing body member or in any other manner with the Agency, provided that no personal benefit, directly or indirectly, should flow from such Agency to any such director.

5. The said Agency who intends to undertake CSR Activity must provide CSR Registration Number to the Company.
6. The Committee shall provide specific Project agenda, targets, target spending, accomplishments, manner of execution etc. to the Agency, subject to discussions with the Agency.
7. The disbursement of funds to the Agency must be done on a progressive basis so as to align with the funding needs of the Project, and to permit the evaluation of the activity carried so far.
8. The Agency must provide periodically reports, to the satisfaction of the Committee, about execution of the Project.

9. CSR Expenditure

The committee shall endeavor to spend at least 2% of the average net profit during the preceding 3 financial years on CSR activities as enumerated above. CSR Expenditure shall include all expenditure including contribution to corpus, for projects or programs relating to CSR Activities approved by Board on the recommendation of its CSR Committee, but does not include any expenditure on any item not in conformity or not in line with activities which fall within purview of Schedule VII of the Companies Act, 2013. The Board of the Company shall approve annual action plan having the list of CSR activities, project / programs, manner of execution of the CSR activities / projects / programs, modalities of utilization of funds, implementation schedule etc. on the recommendation of the CSR Committee in the beginning of every financial year.

10. Monitoring & Reporting

The CSR Committee will be responsible for the monitoring CSR activities and report to the Board from time to time. The Board of the Company shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to that effect.

The CSR Committee has the powers to:

- Seek monitoring and implementation report from the Organizations receiving funds.
- Delegate a designated company official to co-ordinate with the Organization receiving funds to inspect the activities undertaken and ensure information in a timely manner.
- The Committee will prepare a quarterly report of CSR spend;
- A presentation on the progress of the CSR projects / activities will be made by the Committee to the Board from time to time;
- An annual presentation will be made by the Committee which will also include the details of the projects / activities planned for the next year and its respective budgets.

The Board of Directors of Gargi Hüttenes Albertus Private Limited shall periodically review the implementation of CSR activities. In case of Ongoing Projects, the Board shall monitor the implementation of the Project with reference to the approved timelines and year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the Project within the overall permissible time period.

11. Disclosures

The Board's Report of the Company include a section on CSR, outlining the CSR Policy, CSR committee, CSR initiatives undertaken by Company, the CSR spend during the financial year and other information as required by the prevailing law.

(This document was approved by the Board of Directors at its Meeting held on September 17, 2021)