

**Dewas Bhopal Corridor Private
Limited**

Corporate Social Responsibility Policy

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1. Preamble

As a conscientious corporate citizen, Dewas Bhopal Corridor Private Limited ("DBCPL") recognizes its role and responsibility to address some of country's most pressing challenges relating to education, health, equality, environment, rural sports, rural development, socio economic development and access to various facilities for a decent living of mankind.

We are committed to enable people and technology to drive innovation, disseminate knowledge, and create shared value to improve lives. This is our corporate social responsibility philosophy (CSR).

Our CSR is strongly connected with the principles of sustainability; an organization should make decisions based not only on financial factors, but also considering the social and environmental consequences. As a corporate citizen receiving various benefits out of society, it is our co-extensive responsibility to pay back in return to the society in terms of helping needy people by providing foods, clothes, medicines etc., keeping the environment clean and safe for the society by adhering to the best industrial practices and adopting best technologies and so on. It is the company's intent to make a positive contribution to the society in which the company operates. Being a responsible corporate citizen and belonging to a well-known group in the country and internationally, DBCPL aims to lead the path not only through products and services, but also via sustainability and CSR initiatives. DBCPL remains committed to responsibly and ethically to maintain the trust of its customers, its employees and other stakeholders.

2. Purpose

- The main objective of this CSR Policy is to lay down guidelines to make CSR a key business process for sustainable development of the society and the environment in which the Company operates;
- This Policy specifies the projects and programs that can be undertaken, provides an indicative list of CSR projects/ programs in terms of the Schedule VII to the Companies Act, 2013;
- Establishing a guideline for complying with the provisions of the regulations and to dedicate a percentage of Company's profits for social projects;
- Ensuring the implementation of CSR initiatives in letter and spirit through appropriate procedure and reporting;

- Serve as a guiding document to help execute and monitor CSR projects;
- Elucidate criteria for partner implementation agencies;
- Explain the manner in which the surpluses from CSR projects will be treated;

3. Scope of CSR activities in DBCPL

As a practice, we classify only those projects that are over and above our normal course of business as CSR. This policy applies to all our CSR projects and it will be further reviewed and updated.

4. CSR Activities/ Projects

Schedule VII to the Companies Act, 2013 lists down the activities which may be included by Companies in their corporate social responsibility policies including modification amendments, circular and notification thereof. The said activities relates to CSR are as follows;

Sr. No	Activities
1	Eradicating hunger, poverty and malnutrition, “promoting health care including preventive health care” and sanitation 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 4[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;

7	Training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports
8	Contribution to the prime minister's national relief 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	Contributions or funds provided to technology incubators located within academic institutions which are approved by the central govt.
10	Rural development projects
11	Slum area development. For the purposes of this item, the term `slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force

The DBCPL will spend on CSR Programs and Projects among any of the activity as stated in aforesaid table.

5.1.1 Members

Sr No	Names	Chairman / Member
1	Narayanan Gopalakrishnan	Chairman
2	Mahendra Bisht	Member
3	Sandeep Garg	Member
4	Hukmi Chand Jain	Member

(Upon appointment or cessation of Directors committee members may be reconstituted)

5.1.2 Responsibilities

- To Formulate, recommend and update our CSR Policy, which will be approved by the Board of DBCPL;
- To recommend the amount of expenditure to be incurred on CSR activities.
- Suggest areas of intervention to the Board;
- 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 who will approve it;
- To monitor CSR activities and report to the Board from time to time;
- Meet at least twice a year to review the progress made.

6. CSR Budget

The total budget for the CSR projects will be recommended by the CSR Committee.

- The company shall spend, in every financial year, at least two per cent. of the average net profits of the company made during the three immediately preceding financial years (calculated as per Section 198 of the Act), towards CSR activities;
- DBCPL shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR activities. CSR Projects or Programs or activities undertaken in India only shall amount to CSR Expenditure

7. Treatment of Surplus

Any surplus generated from CSR projects undertaken by the Company will be tracked and channelized into Company's CSR corpus. These funds will be further used in development of the CSR projects and will not be added to the normal business profits.

8. Monitoring Review and Evaluation

The CSR Committee has the powers to seek monitoring and implementation report from the Organizations where funds are invested.

Monitoring mechanism for implementation of the CSR projects or programs or activities undertaken

- **Financial Accountability**, all CSR activity shall have suitable and proper bill to ensure & prove that amount is spent only on relevant CSR activity.
- **Review**, Each CSR activity shall be reviewed as and when it required.

9. Information dissemination

The Annual 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.

The following format could be Included in the Annual Report on CSR Activities

1. A brief outline of the company’s CSR Policy, including overview of the projects or programs proposed to be undertaken and a reference to the web-link to the CSR policy and projects or programs.
2. The Composition of the CSR Committee.
3. Average net profit of the company for last three financial years.
4. Prescribed CSR Expenditure (two per-cent of the amount in item 3 above)
5. Details of CSR Spent during the financial year.
 - a. Total Amount to be spent for the financial year;
 - b. Amount Unspent, if any
 - c. Manner in which the amount spent during the financial year is detailed below.

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
S. No	CSR Project or activity identified	Sector in which the Project is covered	Projects or Programs (1) Local area or other (2)Specify the State and district where projects or programs was undertaken	Amount outlay (budget) project or programs wise	Amount spent on the projects or programs Sub-Head (1) Direct expenditure on projects or programs (2) overheads	Cumulative expenditure upto to the reporting period	Amount spent Directly or through implementing agency
1							
2							

3							
Total							

*Give details of implementing agency

- 6. In case the company has failed to spend the two percent of the average net profit of the last three financial years or any thereof, the company shall provide the reason for not spending the amount in it's Board report.
- 7. A responsibility statement of the CSR Committee that the implementation and monitoring of CSR Policy, is in compliance with CSR objective and Policy of the company

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