

CORPORATE SOCIAL RESPONSIBILITY POLICY

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1. Concept and Vision

Vakrangee Limited strongly believes that sustainable community development is essential for harmony between the community and the industry. We endeavor to make a positive contribution to the underprivileged communities by supporting a wide range of socio-economic, educational and health initiatives. Also, we are committed to integrate our business values and operations to meet the expectations of all our stakeholders.

In this regard, we have made this policy which encompasses our philosophy for delineating our responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programs for welfare & sustainable development of the community at large and is titled as the “CSR Policy” which is based as per our (Corporate Social Responsibility Policy) Rules, 2014 initiated by the Central Government under the relevant provisions of Section 135 of the Companies Act, 2013 and Schedule VII of the said Act.

This CSR Policy shall apply to all corporate social responsibility initiatives and activities undertaken by us for the benefit of different segments of the society and for enhancement of the fields like education, health care, environment, employment, promoting gender equality and women empowerment etc. more particularly described below.

2. Objectives of The Policy

The objectives of this policy are to:

1. Demonstrate commitment to the common good through responsible business practices and good governance
2. Actively support the nation’s development agenda to ensure sustainable change
3. Set high standards of quality in the delivery of services in the social sector by creating robust processes and replicable models

3. Applicability

1. Our CSR policy has been developed as per Section 135 of the Companies Act, 2013 (referred to as the Act in this policy) on CSR and in accordance with the CSR rules (hereby referred to as the Rules) notified by the Ministry of Corporate Affairs, Government of India in 2014.
2. The Policy shall apply to all CSR projects/programs undertaken by us in India as per Schedule VII of the Act as amended from time to time.
3. This policy shall be applicable to us including all our subsidiaries, and all employees.
4. CSR Policy is also in accordance with the various clarifications and notifications of MCA (Ministry of Corporate Affairs) issued till date.
5. The CSR projects or programs or activities that benefit only our employees and their families shall not be considered as CSR activities in accordance with Section 135 of the Act.
6. The contribution of any amount directly or indirectly to any political party under Section 182 of the Act shall not be considered as CSR activity.

4. CSR Initiatives and Activities

We may adopt any one or more of the following initiatives and activities as enumerated in Schedule VII of the Companies Act, 2013 or as may be amended from time to time under this CSR Policy:

1. Healthcare

Eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swachh Bharat Kosh setup by the Central Government for the promotion of sanitation and making available safe drinking water;

2. Contribution to various bodies

Contributing or collaborating with registered trust, voluntary organizations, academic institutes, government or a registered society or a company undertaking CSR activities;

3. Education

Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently-abled and livelihood enhancement projects;



4. Equality

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;

5. Environment

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;

6. Preservation of Art and Culture

Protection of natural 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 arts and handicrafts;

7. Armed Force

Measures for the benefit of arm forces veterans, war widows and their dependents;

8. Sports

Training to promote rural sport, nationally recognized sports, Paralympic sport and Olympic sports;

9. Contribution to incubators

Contribution to incubators funded by Central Government or State Government or any agency or Public Sector Undertaking of Central Government or State Government, and contributions to public funded Universities, Indian Institute of Technology (IITs), National Laboratories and Autonomous Bodies (established under the auspices of Indian Council of Agricultural Research (ICAR), Indian Council of Medical Research (ICMR), Council of Scientific and Industrial Research (CSIR), Department of Atomic Energy (DAE), Defence Research and Development Organization (DRDO), Department of Science and Technology (DST), Ministry of Electronics and Information Technology) engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs);

10. Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government;

11. Rural development projects;

12. Slum area development.

Any of the aforesaid initiatives and the activities that may be undertaken by the Company will be referred to as "CSR Initiatives and Activities" hereinafter.

For the purpose of this item, the term "slum area" shall mean the 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.

5. Goals

Our Goals include the following:

Sr. No.	Goal Area	Actions
1	Hunger, poverty, malnutrition and healthcare	We will work with organizations working in medical or health - related projects such as providing support for cancer treatment, cataract surgeries, etc.
2	Education	We will strive to provide grants to various colleges in India for improving their infrastructure. Sponsor chairs and create endowment funds for the colleges/ universities to assist students with their studies.
3	Rural and Social Development	We believe that the well - being of people living in rural areas ensures sustainable development. We will work with local administrators to achieve community development goals. We will partner with governments and NGOs and support them in improving infrastructure such as constructing roads, providing drainage systems and electricity, and rehabilitating natural - disaster affected victims in rural areas.
4	Gender equality, environmental sustainability, art and Culture.	We will, among other things, focus on promoting gender equality and empowering women, ensuring environmental sustainability, ecological balance, protection of flora and fauna and protection of national heritage, art and culture including restoration of buildings and sites of historical importance.

6. CSR Budget

CSR Committee will recommend the project wise annual budgeted expenditure to the Board for its consideration and approval.

For achieving our CSR initiatives and activities through implementation of meaningful and sustainable CSR programs, we will endeavor to allocate, in every financial year, at least 2% of the average net profits of the organization made during the three immediately preceding financial years, in pursuance of our Corporate Social Responsibility Policy.

The Annual CSR Budget would also include

1. 2% of the average net profits as defined above
2. Any income arising therefrom; and
3. Surplus arising out of CSR Initiatives and Activities (any surplus arising out the CSR projects or programs or activities shall not be part of the business profits of the Company).

Salaries paid by the companies to the regular CSR staff as well as to the volunteers of the companies (in proportion to company's time/hours spent specifically on CSR) can be factored into CSR project cost as part of the CSR expenditure.

7. Implementation

7.1 CSR Committee:

CSR Initiatives and Activities will be initiated by a committee comprising of 3 (Three) or more Directors, out of which one shall be Independent Director.. The Corporate Social Responsibility ("CSR Committee") Committee shall:

1. Formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the company as specified in Schedule VII;
2. Recommend the amount of expenditure to be incurred on the activities referred to in clause (a); and
3. Monitor the Corporate Social Responsibility Policy of the company from time to time.

7.2 CSR Initiatives and Activities

We endeavor to make CSR a key business process for sustainable development. We strongly believe that the sustainable community development is essential for harmony between the community and the industry. We are committed to integrate our business values and operations to meet the expectations of all our stakeholders.

In pursuing our CSR activities, we may also collaborate with other companies for undertaking projects or programs or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programs in accordance with Companies (Corporate Social Responsibility Policy) Rules, 2014.

We may also build CSR capacities of our own personnel as well as those of its implementing agencies through institutions with established track records of at least three financial years but such expenditure shall not exceed 5% of the total CSR expenditure of the Company in one financial years.

The time period and/or the duration over which a particular CSR Initiative and Activity will be spread will depend on its nature, extent of coverage and the intended impact of the said initiative or activity which will be determined by the CSR Committee.

7.3 Guiding Principles

To attain our CSR objectives in a professional and integrated manner, we shall:

1. Undertake proactive engagement with stakeholders to actively contribute to the socio-economic development of the periphery/community in which it operates.
2. Create a positive footprint within the society by creating inclusive and enabling infrastructure/ environment for livable communities.
3. Ensure environmental sustainability by adopting best ecological practices and encouraging conservation/judicious use of natural resources.
4. Work towards mainstreaming the marginalized segments of the society by striving towards providing equal opportunities and making meaningful difference in their lives.
5. Focus on educating the girl child and the underprivileged by providing appropriate infrastructure, and groom them as future value creators.
6. Assist in skill development by providing direction and technical expertise to the vulnerable thereby empowering them towards a dignified life.
7. Emphasize on providing basic nutrition/health care facilities with special focus on establishing health centers for the mother and child as well as the elderly.
8. Facilitate water conservation by reducing water consumption at the plants and taking up rainwater harvesting projects.
9. Create a business value chain which is sustainable – environmentally, socially, economically.
10. Promote an inclusive work culture.
11. Work towards generating awareness for creating public infrastructure that is barrier free, inclusive and enabling for all including the elderly and the disabled.
12. Create positive awareness towards the need to adopt measures that lead towards reducing carbon footprints, dependence on fossil fuels and promote alternate energy approaches.
13. Promoting the well-being and development of employees and their families through an inspiring corporate culture that engenders good values.
14. Encourage and motivate employees to spend time volunteering on issues of their interest. Employee participation is an important part of developing responsible citizenship.



15. At the time of national crisis, as a company it is imperative for us to respond to emergency situations & disasters by providing timely help to affected victims and their families.
16. Promote economic, social, educational, infrastructural and health development by providing active support to local initiatives.
17. Create significant difference in the lives of stakeholders by aligning initiatives with sustainable development.
18. Optimum use of physical, financial and natural resources by collaborating with Government Organizations, community-based organization, donor agencies, foundations, corporates and other development/likeminded partners.
19. Ensure stakeholders participation in planning and execution of development initiatives to create ownership and accountability.
20. Enhance capacity, skill and competence of employee, development partners, community and other stakeholders to enable them to involve in sustainable development initiatives.
21. Organize local youths to promote Sports, Art and Culture and create an opportunity for them so that they can represent their country.
22. Ensure People/Community participation during execution of CSR activities.
23. Environment conservation through sustainable initiatives

8. Specialized Executing Agencies/ Partners

CSR Initiatives and Activities identified under this CSR Policy may also be implemented through specialized executing agencies/partners which could include – voluntary organizations, formal or informal elected local bodies such as Panchayats; Institutes/Academic Institutions; other Trusts; Self Help Groups; Government/Semi Government Agencies/autonomous organizations; Mahila Mandals; Professional Consultancy Organization etc.

The CSR Committee in its discretion may also decide to dovetail and synergize the Company's CSR Initiatives and Activities with the initiatives taken by the aforesaid specialized executing agencies/partners.

The Company may enter into an agreement with any of the Charitable Trusts registered under the provisions of Bombay Public Trusts Act, 1950 or Indian Trust Act, 1882 or a registered society or a company established under Section 8 of the Companies Act, 2013 and also with the implementing specialized executing agency/partner to lay down the manner of contribution made by the Company for its CSR Initiatives and Activities and enable the Company/CSR Committee to monitor the same so as to ensure that the allocation/contribution is spent for the intended purpose only.

In case of CSR Initiatives and Activities executed by any of the aforesaid specialized executing agencies like NGOs/Trusts/Voluntary organizations, the CSR Committee will ensure the following minimum criteria:

1. The NGO/Trust/Voluntary Organization has a permanent office/address in India;
2. The NGO/Trust/Voluntary organization is duly registered under the applicable laws;
3. The NGO/Trust/Voluntary organization has an established track record of at least three years in carrying out CSR Initiatives and Activities in related areas.
4. The NGO/Trust/Voluntary organization possess a valid Income-tax Exemption Certificate;
5. The antecedents of the NGO/Trust/Voluntary organization are verifiable/subject to confirmation.

9. Area of CSR Initiatives and Activities

The CSR Committee shall while spending/contributing the Annual CSR Budget earmarked for the CSR Initiatives/ Activities shall give preference to the local areas and areas around it where the Company operates.

10. Display of CSR Activities

Appropriate documentation and contents of the Company's CSR Policy, annual CSR Initiatives and activities undertaken with the approval of the CSR Committee through any Charitable Trust and/or specialized executing agencies/partners, and information on the CSR expenditure incurred will be available on the Company's website .

Details on CSR as indicated below will also be reported in the Annual Report of the Company: -

1. A Brief outline of the CSR policy
2. The Composition of the CSR Committee
3. Average net profit of the Company for the last three financial years
4. Prescribed CSR expenditure
5. Total amount to be spent for the financial year
6. Amount unspent, if any
7. Amount carried forward from earlier years
8. Amount spent during the year in the format as prescribed in Annexure-I; and (i) Amount carried forward for the year

In case the company has failed to spend the two per cent of the average net profit of the last three financial years or any part thereof, the company shall provide the reasons for not spending the amount in its Board Report.

The progress of CSR Initiatives and Activities under implementation will be reported to the Board of Directors of the Company on regular basis.

11. General

Any or all provisions of this CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued by Government of India, from time to time. Any amendment in the list of CSR activities under Schedule VII of the Companies Act, 2013 shall apply automatically to this policy without any further amendment to the policy.

The Company also reserves the right to modify, cancel, add, or amend any of the provisions of this CSR Policy.

ANNEXURE-I

Sr. No.	CSR Project or Activity identified	Sector in which project is covered	Projects or Programs:	Amount outlay (budget) project or programs otherwise	Amount spent on the projects or programs: 1. Direct Expenditure on projects or on programs 2. Overheads	Cumulative Expenditure up to the reporting period	Amount spent: Direct or through implementing agency
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12. Verification

All the documents, contributions, donation receipts, expenses, etc forming part of CSR activities are verified by the Statutory Auditors of the Company. The same gets reported and disclosed in the Annual Report of the Company.



CORPORATE OFFICE:

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