

CORPORATE SOCIAL RESPONSIBILITY POLICY (CSR POLICY)

The document describes the Corporate Social Responsibility Policy (CSR Policy) of ATV Projects India Limited (“ATV” or “the Company”). It includes Company vision, mission, objective and various other attributes of Corporate Social Responsibility.

1. Vision and Mission

Company is committed to build a sustainable business with strong social relevance and a commitment to inclusive growth and contribute to the society by supporting causes on various matters including environmental sustainability, promoting education, promoting sports and other rural development activities.

In pursuance of our vision that Company desires to be a Company which society wants to exist, we are dedicated towards fulfilling the social objectives through various CSR activities. The Company shall make its endeavor to positively impact and influence the Society for its sustainable development.

In alignment with the above vision, Company, through the CSR Activities, will endeavor to enhance value creation in the society and in the community, through its services, conduct and initiatives, so as to promote sustained growth for the society and community, in fulfillment of its role as a socially responsible corporate.

This CSR Policy has been framed in accordance with the applicable provisions of the Companies Act 2013 and the rules issued there under.

The objective of this CSR Policy is to:

- (i) Outline projects, programs and activities to be undertaken by ATC India;
- (ii) Specify the modalities of execution of such projects, programs and activities;
- (iii) Monitor the process to be followed for such projects, programs and activities;

CORPORATE SOCIAL RESPONSIBILITY POLICY

- (iv) Directly or indirectly take up programs that benefit the communities in and around its work centers and results, over a period of time, in enhancing the quality of life and economic well-being of the local populace; and
- (v) Generate community goodwill for Company and help reinforce a positive and socially responsible image, through our CSR Activities.

The Companies Act, 2013 has brought even greater emphasis on CSR with rules that provide guidance on minimum CSR spend, reporting mechanism, review structure and reporting to the shareholders of the company.

Company CSR Policy has been designed keeping in view the company's business vision, its CSR vision and long-term societal objective the company proposes to serve. Company CSR Policy document has been created with an objective to outline its CSR focus areas, review mechanism, execution process and reporting to the Management and the Board of Directors of the Company. A CSR Committee will be formed at the Board level which will oversee CSR agenda of the Company.

2. CSR Committee

2.1. Constitution of CSR Committee

A Corporate Social Responsibility Committee (herein after referred to as "the CSR Committee") shall be constituted by the Board of Directors consisting of three or more directors in pursuance of the requirements under Section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended from time to time.

Board of Directors shall be empowered to take decision for making or effecting changes in the constitution of the CSR Committee.

The composition of CSR Committee as below:

Mr. M.V. Chaturvedi - Chairman
Mrs. Payal Sanghavi- Independent Director
Mr. Rakesh Tiwari - Independent Director

CORPORATE SOCIAL RESPONSIBILITY POLICY

Mandate of CSR Committee shall be as under:

- (a) To formulate & recommend to the Board of Directors, a CSR Policy indicating the activities to be undertaken as specified in Schedule VII of the Companies Act, 2013;
- (b) To recommend the amount of expenditure to be incurred on the activities referred to above; and
- (c) To monitor the CSR Policy, Projects and Programs from time to time.

2.2. Chairman

The Board of Directors shall decide about the Chairman of the Committee, who shall be a person from among the members of the Committee.

2.3. Meetings of CSR Committee

The CSR Committee shall meet at least once in a financial year. The meeting shall be held either at the Registered office of the Company or any other place, as may be decided by the members.

Two members personally present shall constitute the quorum.

2.4. Notice of Meeting

At least seven days advance notice of every meeting, specifying the day, place & timing of Meeting and the general nature of the business to be transacted there at shall be given to the members. In urgency, a meeting may be convened by shorter notice.

2.5. Decisions at the Meeting

Matters arising in the meeting of the Committee shall be decided by a majority vote of the members present in the meeting. Each member shall be entitled to one vote and in case of tie; the Chairman shall have the casting vote.

3. Responsibility of the Board of Directors

The responsibility of the Board of Directors shall be as under:

CORPORATE SOCIAL RESPONSIBILITY POLICY

- (a) To approve the CSR Policy & disclose the contents of such policy in its report and also place it on the Company's website;
- (b) Ensure that the activities as are included in CSR Policy are undertaken;
- (c) Ensure that the company spends, in every Financial year, at least 2% of average net profits of the Company made during the 3 immediately preceding financial years, as required under Section 135 of the Companies Act, 2013 & Rules made thereunder;
- (d) If company fails to spend the sum as mentioned above, then the Board shall, in its Report specify the reasons for not spending the amount.

4. Areas of CSR Activities

The Company is hereby devoted to direct its resources, to a reasonable extent, for effecting improvement in the quality of life of the people by focusing on the Social Causes, as prescribed under Schedule VII of Companies Act, 2013 as amended from time to time:

- (i) Eradicating hunger, poverty and malnutrition, promoting 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;
- (ii) Promotion of 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 centres 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 including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;

CORPORATE SOCIAL RESPONSIBILITY POLICY

- (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; promotion and development of traditional arts and handicrafts;
- (vi) Measures for the benefit of armed forces veterans, war widows and their dependents;
- (vii) Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports;
- (viii) 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;
- (ix) Contribution or funds provided to technology incubators located within academic institutions which are approved by the Central Government;
- (x) Rural development projects
- (xi) Slum Area Development

Surplus arising out of CSR Projects shall not form part of the business profits of Company instead the same will be further used for CSR purposes only.

Every year, the CSR Committee shall recommend to the Board of Directors the CSR Projects / Programs, specifying modalities of execution & implementation schedules. After obtaining approval from the Board of Directors, the same shall be regarded as final and will be treated as a part and parcel of the CSR Policy.

5. Geographies, beneficiaries and Key Performance Indicators

5.1. Geographies

CORPORATE SOCIAL RESPONSIBILITY POLICY

The Company shall give preference to the local area and areas around it where it operates, for spending the amount earmarked for CSR activities. Company operations are mainly concentrated on following areas:

- State of Maharashtra
- State of Uttar Pradesh
- Any other areas as may be decided by the CSR Committee members from time to time

5.2. Beneficiaries

The Beneficiaries from the CSR Projects / Programs may be the following categories of people:

- Children/students
- Women need help
- Weaker sections in the Society
- Others – society at large

5.3. Key Performance Indicators (KPI)

The CSR Committee Members shall, from time to time, decide about the KPIs based upon the CSR Project / Program to be undertaken.

6. Implementation mechanism

The Company may conduct / implement CSR programs by itself and/or thru Registered Trusts, Societies and / or Non-Government Organizations with an established track record of at least three years in carrying on activities in related areas.

The Company may collaborate or pool resources with other companies to undertake CSR activities and any expenditure incurred on such collaborative efforts would qualify for computing the CSR Spending.

The progress on CSR issues selected by the Company will be reported in the Annual Report in the format prescribed by the CSR Rules.

CORPORATE SOCIAL RESPONSIBILITY POLICY

7. Effective Date

The CSR Policy shall be effective from the date of its approval by the Board of Directors. Provided, however, that all the acts done in pursuance of Section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014.

8. Amendments to the CSR Policy

The CSR Policy can be amended with the prior permission of Board of Directors, as & when required. A proposal for making the amendment shall be prepared by the CSR Committee specifying the reasons and justifications for the amendment. The Board of Directors shall be empowered to approve the proposal, with or without modifications, or may reject the same.

The Board of Directors may also, at their discretion, amend the CSR Policy, from time to time.