

## **CORPORATE SOCIAL RESPONSIBILITY (CSR) POLICY**

### **1. INTRODUCTION**

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**GAWAR KHAJUWALA BAP HIGHWAY PRIVATE LIMITED** a Private Limited Company, incorporated under the Company Act, 2013 on 18<sup>th</sup> April, 2018 with objective to carry on business such as to carry on business of Upgradation to 2 lane with paved shoulder/4 lane of Khajuwala - Poogal section (Design Chainage 0+000 to 30+812) and Poogal - Dantour - Jaggasar - Gokul - Goddu - Ranjeetpura - Charanwala - Naukh – Bap section of NH-911 (Design Chainage 1+430 to 182+725) (Total length 212.107 km) under Bharatmala Pariyojna in the state of Rajasthan on Hybrid Annuity Mode.

Blending enthusiasm for corporate performance with compassion for social communities is central to the Company's corporate philosophy of development of peripheral area and community. Preparing, empowering and inspiring communities in the periphery of its operational divisions for attaining long term provisions through voluntary social actions covering micro-enterprises, self-help groups etc. and regarding the community as a major stakeholder and accordingly identifying their needs and addressing their concern areas has ensured a better quality of life. The Company has been playing a foremost role in the socio-economic development around its operational area and recognized that, its business activities have direct and indirect impact on the society. The Company strives to integrate its business values and operations in an ethical manner to demonstrate its commitment to sustainable development.

### **2. OBJECTIVES OF CSR POLICY**

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- The objective of the CSR Policy is to help enrich the quality of life of the community of the nearby areas of plants or the operational area of the Company;
- Create a positive impact by making sustainable development in the society and promote good environmental practice;
- To be responsible and responsive corporate citizen through endeavors to create a safe, harmonious and ecologically balanced environment for its members and the community at large;
- To maintain commitment to quality, health and safety in every aspect of the business and people;
- To promote equality of opportunity and diversity of workforce through its business operations;
- To have always endeavored to not just live up to it, but try and exceed the expectations of the communities in which we operate.

### **3. AREAS OR ACTIVITIES MAY BE TAKEN BY THE COMPANY FOR ITS CSR OBLIGATION**

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**The Company shall execute the CSR activities as per the Schedule VII of the Companies Act, 2013 and rules made thereunder, as amended from time to time.**

The Company may take any of the activities under the heads or sub heads described below (Indicative not exclusive):

- Eradicating extreme hunger and poverty;

- Promotion of education;
- Promoting gender equality and empowering women;
- Reducing child mortality and improving maternal health;
- Combating human immune-deficiency virus, acquired immune-deficiency syndrome, malaria and other diseases;
- Ensuring environment sustainability;
- Employment enhancing vocational skills;
- Social business projects;
- Contribution to Prime Minister's National Relief Fund or any other fund set up by the Central Government or the State Government for socio-economic development and relief and funds for the welfare of the scheduled casts, the scheduled Tribes, other backward classes, minorities and women; and
- Such other matters as per the Schedule VII of the Companies Act, 2013 and rules made thereunder including any modification or reenactment thereof.

### **3.1 EDUCATION**

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Expansion of education is an important area of community development. Supporting to the educational institutions/trusts/societies by:

- a. Constructing and renovating buildings for schools and colleges;
- b. Providing furniture, lab equipment, computers, exercise books, etc;
- c. Conducting the vocational training programs;
- d. Presenting awards to meritorious student to encourage the education;
- e. Provision for drinking water;
- f. And others.

### **3.2 WOMEN EMPOWERMENT**

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As women empowerment plays a greater role in the development of the community, creativity, skill, acquisition and income generating avenues within the society as a whole.

### **3.3 FLOOD RELIEF**

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Floods are chronic and intractable problems in India. It causes immense damage to property including the infrastructure of surface transport and communication network and render people homeless. The Company may provide Suitable assistance to the needy by providing any of the following:

- Flood relief to the nearby affected villages in the form of cloth and food grains;
- Contribution to Chief Minister's and Prime Minister's relief funds;
- Setting up of community kitchens;
- And others.

### **3.4 SPORTS PROMOTION**

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Financial assistance, training programs, camps etc. may be arranged for various sports for/to the sport persons, organizations or any needy, for conducting games and other programs for increasing the facilities for the sports persons.

### **3.5 EMPLOYMENT GENERATION**

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Conducting entrepreneurship incubation programs for the local unemployed youth by sponsoring them for entrepreneurship development training and encouraging them to start ancillary units. And any other activities for the promotion of employment as the Board may think fit.

### **3.6 INFRASTRUCTURE DEVELOPMENT INCLUDING RURAL DEVELOPMENT**

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The following infrastructure development and rural development activities may be executed for developing the local villages by:

- Providing safe drinking water;
- Construction of tube wells in around the villages of the company or in any undeveloped area;
- Construction of roads in the villages;
- Construction of connector roads from far off villages;
- Street lightings;
- And others as the Board may think fit;
- Ventilation of waste or discharged substance through underground sewage or holes;
- Construction of dharamshalas, rest rooms, dispensaries, vocational training setups etc;
- Any other project or activities that the board may consider justified as per the requirement.

### **3.7 HEALTH CARE AND FAMILY WELFARE**

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To carry out various health care programs periodically in the nearby villages by:

- Organizing medical camps;
- General health check-up through mobile dispensaries;
- Eye check-up & blood donation camps with the help of external agencies;
- Providing ambulance services;
- Extending special services to the physically handicapped & mentally challenged people;
- And others as the Board think fit.

### **3.8 ANIMAL WELFARE**

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To carry out any project, activities, programs through any other trust, society, Charitable companies or any associations having prescribed track record or through acquiring such organizations or through the setting up of an organization/s by company itself for the following: -

- to improve the health conditions of animals by providing clean drinking water, shelters, medical aids etc.
- to help the diseased, unhealthy, sick animals by providing medical assistance.
- set up of Gashalas, Animal Homes etc. for homeless and on the street's animals.
- any other as the board may consider appropriate.

#### **4. BUDGET**

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- Every year budget for CSR activities shall be decided by the Board, which shall not be less than 2% of the average net profit (if any), of the Company made during the three immediately preceding financial years;
- The CSR programs will be planned according to the budget allocation and budget will be allocated by the approval of Board decided time to time as per the requirement;
- In exceptional circumstances percentage of budget allocation may be varied with the approval of the Board subject to the provisions made under Company Act, 2013.

#### **5. FUNDING**

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The allocation of funds for CSR projects & activities will be approved by the Board after the consideration of the recommendations of the CSR Committee time to time and as per the conditions and requirements.

- If there is any loss during any three consecutive financial year, it is not mandatory to spend any amount on CSR activities in the next year.

#### **6. ORGANIZATIONAL/IMPLEMENTATION MECHANISM**

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- The Company may take up the projects directly or through the NGOs/Trust namely **GAWAR FOUNDATION** or any other agency/respective district authorities as may be decided with the approval of Board of Director.
- The company may acquire, takeover, tie up and enter into agreement with/to any other organization or association to carry out the CSR activities.

#### **7. GENERAL PROVISIONS**

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- All administrative expenses including expenditure on wages & salaries, tour and travels, training & development of personnel deputed on CSR activities would be borne from CSR funds;
- The competent authorities shall take decision on sanctioning works/allocation of funds for CSR and appointing authorized agencies for implementing Projects/Activities shall be as specified in the delegation of power approved by the Board;

- If it is observed that any CSR activity taken up for implementation is found not properly implemented, the Company at its discretion may discontinue funding the projects at any time during the course of implementation;
- The Committee and the Board of Directors will make every effort to implement the CSR provisions as per the literal interpretation of the relevant provisions of Company Act, 2013.
- The CSR Policy and composition of CSR committee shall form part of the Report of Board of Director and also shown on the Company's website, if any;
- If in any financial year the Company has failed to spend the 2% of the Average Net Profit of the last 3 financial year, then the reason thereof shall be disclosed by the Board in their Report;
- CSR committee shall monitor the CSR Policy of the Company as per requirement of Company Act, 2013 and to execute the Policy in such manners which will be suitable to the present business scenario and situations to achieve the object of this Policy;
- Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the guidelines on the subject as may be issued from Government, from time to time.

## **9. CORPORATE SOCIAL RESPONSIBILITY COMMITTEE**

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- The Corporate Social Responsibility Committee shall consist of three or more Directors.
- The quorum of the meeting of the committee will be one third of the total members or two members whichever is less.
- The Committee shall hold meetings as and when required, to discuss various issues on implementation of the CSR Policy.
- The CSR Committee shall:
  - (a) Formulate and recommend to the Board, the activities to be undertaken by the company as specified in Schedule VII of the Companies Act 2013 (the Act);
  - (b) Monitor the Corporate Social Responsibility Policy of the company from time to time;
  - (c) Formulate and update our CSR policy, which will be approved by the Board of the company;
  - (d) Review the progress of CSR projects already undertaken by the company and the utilization of budgets for each such projects;
  - (e) Any other matter as may be considered expedient in furtherance of and to comply with the CSR Policy.

## **10. MONITORING AND FEEDBACK**

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CSR committee of the company will be responsible for the monitoring of various CSR projects or programs undertaken by the company directly or indirectly. The committee shall ensure that:

- CSR initiatives of the Company will be reported in the Board's Report in compliance with Section 135 and rules made thereunder.
- The objective of the project/program is achieved as per the plans.
- The projects/ programs are implemented as per the program approved by the board.

## **11. TREATMENT OF SURPLUSES**

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

## **12. Validity of CSR Policy**

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This policy is effective from April 1, 2020 and may be amended by the Board as required from time to time.