

ARO GRANITE INDUSTRIES LIMITED

Corporate Social Responsibility Policy (CSR Policy)

Vision:- To actively contribute to the social and economic development of the communities in which the Company operates. In doing so, build a better, sustainable way of life for the weaker sections of society and raise the country's human development index.

Objective:- The focus of the Company's CSR initiatives is on the all-round development of the communities located mostly in rural and semi-urban areas.. These initiatives have also aim to accord priority to activities pertaining to inclusive growth of the society.

Legal Provisions of CSR:-

The Corporate Social Responsibility Policy (The Policy or the CSR Policy) has been framed in accordance with Section 135 of the Companies Act, 2013 (the Act) and the Companies (Corporate Social Responsibility Policy) Rules, 2014 (the Rules) as amended from time to time. The Policy shall apply to all CSR projects and activities to be undertaken by the Company. The Policy contains the approach and direction given by the Board of Directors, taking into account the recommendations of the CSR Committee

It requires that at least 2% of the average net profits of the Company made during the 3 immediate preceding Financial Years shall be spent in pursuance of the Company's Corporate Social Responsibility Policy.

Average Net Profit for the aforesaid purpose shall be calculated in accordance with the provisions of Section 198 of the Companies Act, 2013.

Constitution of CSR Committee and Formulation of CSR Policy

In accordance with Section 135 of the Act and Rules thereunder, the Company has a duly constituted Corporate Social Responsibility Committee of the Board (CSR Committee). The role of the CSR Committee, inter alia, includes the following:

- (i) Formulate and recommend to the Board, a CSR Policy which shall indicate the activities to be undertaken by the Company in areas or subject, specified in Schedule VII to the Act. [Preference to be given to the local areas in and around Company's Plants]
- (ii) Recommend the amount of expenditure to be incurred on the activities.
- (iii) Monitor the CSR Policy of the Company from time to time.
- (iv) Formulate and recommend to the Board, an Annual Action Plan in pursuance of this Policy which shall include the following, namely:

- a. the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- b. the manner of execution of such projects or programmes;
- c. the modalities of utilisation of funds and implementation schedules for the projects or programmes;
- d. monitoring and reporting mechanism for the projects or programmes; and
- e. details of need and impact assessment, if any, for the projects undertaken by the Company.

(Note: The Board of Directors of the Company may alter such plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect).

Guiding Principles for Selection of CSR Activities, Expenditure, Budget and Surplus arising out of CSR activities

The Company shall undertake CSR activities as defined in the Act, Rules thereunder and Schedule VII to the Act and promote CSR objectives of the Company. The Board would consider and approve amount to be spent on CSR activities during every financial year as recommended by the CSR Committee and as required under the law. Surplus, if any, arising out of the CSR projects or programmes or activities shall not form part of the business profit of the Company.

The guiding principles for selection of project/activity shall be that the project/activity must be in areas/subjects specified in Schedule VII to the Act and promote CSR objectives of the Company.

Planning and Implementation

The Company shall list the CSR projects/activities to be undertaken as per format prescribed in the Annexure – A. All the CSR projects/activities will be compliant with the provisions of the Act and Rules thereunder and will be in line with Schedule VII to the Act. The Company may consult/enlist enabling organizations and regulatory bodies to assist it in carrying out its CSR projects.

Implementing Agencies:

The CSR projects/activities can be undertaken by the Company itself or through:

- a. a company established under Section 8 of the Act, or a registered public trust or a registered society, registered under Section 12A and 80G of the Income Tax Act, 1961 (43 of 1961), established by the Company, either singly or along with any other company, or

- b. a company established under Section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or
- c. any entity established under an Act of Parliament or a State legislature; or
- d. a company established under section 8 of the Act, or a registered public trust or a registered society, registered under Section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

Every entity covered under Para a to d above, who intends to undertake any CSR activity shall register itself with the Central Government in accordance with the provisions of the Act.

Provided that this shall not affect the CSR projects or programmes approved prior to 1st April 2021.

The Company may also collaborate with other companies for undertaking projects or programmes 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 programmes in accordance with the Rules.

The Chief Financial Officer or any other person responsible for financial management of the Company shall certify to the Board that the funds disbursed for CSR projects/activities have been utilised for the purposes and in the manner as approved by the Board of Directors of the Company.

CSR Team

The CSR Committee may constitute a CSR team comprising of such members as the Committee may deem appropriate.

The CSR Team will be responsible for the actual on-ground implementation of CSR projects across the various areas of intervention of the Company. They will also:

- i. Be responsible for the execution of the decisions taken by the CSR Committee.
- ii. Implement projects based on set targets and action plans and regularly monitor them.
- iii. Find suitable implementation partners and conduct due diligence.
- iv. Evaluate possible collaborations with other organizations on CSR projects.
- v. Provide periodic progress reports to the CSR Committee.

CSR Monitoring

- (a) In case of ongoing projects, as defined under the Act and the Rules thereunder, the Board of Directors shall monitor the implementation of project with respect to approved timelines, year-wise allocation and shall be competent to make modifications, if any, for smooth implementation of the project within the overall permissible time period.
- (b) A comprehensive monitoring mechanism will be devised by the Company to ensure that the CSR process functions as mandated by the Act and projects as budgeted are duly carried out and the budget is optimally utilized. Monitoring may have both an electronic MIS and human architecture that must work together to ensure a check on the above. This may include regular field visits to project sites, activity-wise documentation of the same in the form of field reports, regular interaction with beneficiary communities to obtain feedback and compilation of field visit reports at regular intervals.

Impact Assessment

The Company may take up appropriate evaluation and impact assessment of all or selected projects. Third parties may be engaged for this to ensure objective assessment. There shall be clarity about the objective/scope of the project and the need it is attempting to address.

Further, in respect of the projects to which the provisions of the Act and Rules thereunder relating to impact assessment are applicable, the Company, if required, shall undertake impact assessment, through an independent agency. The impact assessment reports shall be placed before the Board and shall be disclosed in such manner and at such place as may be prescribed in the Act.

Documentation

The CSR Team of the Company will make effort that CSR projects are documented, and accountability is fixed at requisite level of the CSR process and the implementation mechanism. A repository of case studies and good practices may be compiled to learn from and build upon successful interventions.

Disclosure

The Company shall follow and comply with the requirements for disclosure of the CSR Policy and/ or CSR activities in the Board's Report and on the website of the Company or otherwise, as may be required in terms of the provisions of the Act, as applicable from time to time.

Annexure A

S. No.	CSR Project or Activity identified	Whether related to ongoing project (Y/N)	Areas or subject, specified in Schedule VII	Geographical Location (District & State)	Amount Budgeted (Rs. in crore)	Implementation Schedule	Details of Implementation Agency used (if any)

Reporting Mechanism

A quarterly report on the utilization of funds shall be forwarded to the members of the CSR Committee. The reporting shall be in the following format:-

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 were undertaken	Amount outlay (budget) project or programs wise	Amount spent on the projects or programs Subheads: 1. Direct expenditure on projects or programs. 2. Overheads:	Cumulative expenditure upto the reporting period	Amount spent: Direct or through implementing agency
1							
2							
3							
4							
5							