

CSR POLICY

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Office of Origin: CSR Committee

Policy Approval Authority: Executive Director

Objective

The Corporate Social Responsibility Policy (CSR) policy is being developed for the organization to comply with the provisions of section 135 of the Companies Act 2013, Companies (Corporate Social Responsibility Policy) Rules 2014 and Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021. The CSR Committee is required inter alia, to formulate and recommend to the Board, a Corporate Social Responsibility Policy, which shall indicate the activities to be undertaken by the Company and monitor the said policy from time to time.

The main objective of CSR policy is to make CSR a key business process for sustainable development of society. Aurum RealEstate Developers Ltd. will act as a good corporate citizen and aims at supplementing the role of Government in enhancing the welfare measures of the society within the framework of its policy. We are committed to spending up to 2% of the average net profit for the preceding three financial years on CSR projects or programs related to activities specified in Schedule VII to the Act or such activities as may be notified from time to time.

Measures

In the aforesaid backdrop, policy on CSR of Aurum RealEstate Developers Ltd. is broadly framed taking into account the following measures:

The CSR activities shall be undertaken by Aurum RealEstate Developers Ltd., as stated in this Policy, as projects or programs or activities (either new or ongoing), excluding activities undertaken in pursuance of its normal course of business.

The CSR activities which are exclusively for the benefit of Aurum RealEstate Developers Ltd. employees or their family members shall not be considered as CSR activity.

Aurum RealEstate Developers Ltd. shall give preference to the local area or areas around it where it operates, for spending the amount earmarked for CSR activities.

The Board of Aurum RealEstate Developers Ltd. may decide to undertake its CSR activities as recommended by the CSR Committee, through a registered trust or a

registered society or a company established by the company or its holding or subsidiary or associate company or through its own pursuant to Section 135 of the Companies Act, 2013 and rules made there-under.

The Company under its CSR policy, affirms its commitment of seamless integration of market place, work place, environment and community concerns with business operations by undertaking following activities / initiatives that are not taken in its normal course of business and/or confined to only the employees and their relatives and which are in line with the broad-based list of activities that are set out under schedule VII of the Companies Act 2013 and Rules as under:

- a. Eradicating hunger, poverty and malnutrition (promoting health care including preventive health care) and sanitation and making available safe drinking water.
- b. Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- c. 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.
- d. 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.
- e. 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.
- f. Measures for the benefit of armed forces veterans, war widows and their dependents.
- g. Training to promote rural sports, nationally recognized sports, Paralympic sports and Olympic sports.
- h. Contribution to the prime minister's national relief fund 8 [or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES 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;

- i. Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and
- j. Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
- k. rural development projects
- l. slum area development
- m. disaster management, including relief, rehabilitation and reconstruction activities.
- n. To undertake such initiatives/ projects or participate in any events as the CSR Committee / Board may consider appropriate.

Any other measures with the approval of Board of Directors on the recommendation of CSR Committee subject to the provisions of Section 135 of Companies Act, 2013 and rules made there-under.

The Board of Directors of the Company shall ensure that the CSR activities are undertaken by the Company itself or through entities mentioned in Companies (Corporate Social Responsibility Policy) Rules 2014 as amended from time to time.

Composition of Corporate Social Responsibility Committee

The CSR Committee shall comprise of three or more directors, including at least one independent director and shall be in accordance with the requirements of the Companies Act, 2013 and the Rules made thereunder.

Roles and Responsibilities:

- Decide CSR projects or programmes or activities to be taken up by the Company as per Schedule VII.
- Place before the Board the CSR activities proposed to be taken up by the Company for approval each year.
- Define and monitor the budgets for carrying out the initiatives.
- Submit a report to the Board of Directors on all CSR activities during the Financial Year. This will be displayed on the company's website -- www.aurumrealestate.in
- Monitor and review the implementation of the CSR policy.

CSR ANNUAL ACTION PLAN

The CSR committee shall formulate and recommend to the Board, an annual action plan in pursuance of its CSR policy and shall include the following activities to be carried out for implementing in the financial year:

- a) the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in the Act and rules made thereunder;
- b) the manner of execution of such projects or programmes as specified in the Act and rules made thereunder
- 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:

Provided that Board may alter such plan at any time during the financial year, as per the recommendation of its CSR Committee, based on the reasonable justification to that effect.

Monitor the Policy of the Company from time to time.

The Board of the company shall after taking into account the recommendations made by the CSR Committee, approve the policy for the company and disclose contents of such Policy in its report and also place it on the company's website and ensure that the activities as are included in the CSR Policy of the company are undertaken by the company.

The Board of Directors of the company may undertake CSR activities approved by the CSR committee directly through Aurum Foundation or as may be decided by Committee from time to time. The Board, through its CSR committee, plans and monitors expenditure and reports outcomes of such CSR projects or programmes or activities.

The implementation schedules of each CSR project is executed as proposed in the form submitted to the Board.

Activities, setting measurable targets with timeframes and performance management:

The study encompasses various parameters such as – health indicators, literacy levels, sustainable livelihood processes, and population data – below the poverty line and above the poverty line, state of infrastructure, among others.

All activities/projects of CSR are assessed under the agreed strategy, and are monitored every quarter/year, measured against targets and budgets. Wherever necessary, midcourse corrections are made.

CSR Expenditure

1. The board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year.

2. Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.

3. Where the Company spends an amount in excess of requirement provided under sub-section (5) of section 135, such excess amount may be set off against the requirement to spend under sub-section (5) of section 135 up to immediate succeeding three financial years subject to the conditions that –

(i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, in pursuance of sub-rule (2) of this rule.

(ii) the Board of the company shall pass a resolution to that effect.

Management Commitment

Our Board of Directors, our Management and all of our employees subscribe to the philosophy of compassionate care. We believe and act on an ethos of generosity and compassion, characterized by a willingness to build a society that works for everyone. This is the cornerstone of our CSR policy.

Update

CSR Committee of Board of Aurum RealEstate Developers Ltd. will review the policy from time to time based on the changing needs and aspirations of the target beneficiaries and make suitable modifications as may be necessary.

Necessary disclosures relating to the Policy and CSR Plan will be disclosed in the Annual Report as required by the relevant rules and regulations.