

**ANSAL PROPERTIES & INFRASTRUCTURE
LIMITED**

**CORPORATE SOCIAL RESPONSIBILITY
POLICY
[AMENDING POLICY DATED THE 12TH
AUGUST, 2017]**

BACKGROUND

Ansal Properties & Infrastructure Limited {including its subsidiaries, affiliates, associate(s), joint venture(s), group company (ies)} (hereinafter referred as the 'APIL or Company') believes in the conduct of its affairs in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour and in complete compliance of laws, as amended from time to time.

REQUIREMENT OF CORPORATE SOCIAL RESPONSIBILITY {CSR}

Section 135 of the Companies Act, 2013 {in short "Act"}, read with the Companies {Corporate Social Responsibility Policy} Rules 2014 {In short "CSR Rules"}, mandates companies meeting specified net worth or turnover or net profit during any financial year to constitute a Corporate Social Responsibility Committee of the Board of Directors {in short "Board"}, formulate a Corporate Social Responsibility Policy {in short "CSR Policy"} including the activities specified in Schedule VII of the Act and ensure spending in each financial year, at least 2%{two per cent} of their average net profits made during the three immediately preceding financial years in pursuance of their CSR Policy.

SHORT TITLE & APPLICABILITY

This Policy, which encompasses the Company's philosophy to delineate its responsibility as a corporate citizen and lays down the guidelines and mechanism for undertaking socially useful programmes for welfare & sustainable development of the community at large, is titled as "APIL CSR Policy". This shall apply to all CSR activities i.e. projects or programs, activities undertaken or to be undertaken by the Company in terms of Section 135 of the Act and CSR Rules {in short, "CSR activities"}. These activities shall exclude those undertaken or to be undertaken by the Company in pursuance of its normal course of business.

EXISTING CSR ACTIVITIES

The Company draws its inspiration for engaging in CSR activities from the legacy of the Ansal API Group. The Company is, thus already engaged in social and philanthropic causes since long. It extends its support towards

community service by enhancing the quality of life in the fields of education, healthcare, community welfare, & rural developments, housing for

economically weaker section of society, senior citizen home, providing food for the poor and the needy, resource conservation & environment, promotion of literature, as well as religious and spiritual activities. The Company, in this regard, is presently engaged through charitable companies, Trusts, other NGOs, namely, among others, Sushil Ansal Foundation, Kusumanjali Foundation {Section 8 Companies}, Ansal Diya Foundation, Shanti Sahyog, Divya Chaya Trust and Kahma Welfare Committee.

COMPLIANCE

The Company shall comply with Section 135 of the Companies Act, 2013 and Companies {Corporate Social Responsibility Policy} Rules 2014, as amended from time to time and also various notifications/ clarifications, issued from time to time, and any other applicable provisions of any statute.

OVERALL OBJECTIVES

To pursue the CSR objectives the Company will endeavour to:

- Continue to undertake social responsibilities as a dependable corporate citizen functioning in the society.
- Collaborate with like-minded bodies such as governments, voluntary organizations and academic institutes, in pursuit of its goals.
- Interact regularly with stakeholders, review and publicise the CSR initiatives.
- Volunteering by APIL employees beyond their allocated duties, is duly recognized.

IMPLEMENTATION & THROUGH EXECUTING AGENCIES

The Company is undertaking and shall undertake CSR activities either on its own and/or through charitable company/ies u/s 8 of the Act and/or Trust/s which are already established/ to be established by it or its promoters and/or undertake CSR activities through its subsidiary/ies and/or associate company/ies.

The Company will accomplish its CSR objectives either on its own and/or through:

- a. Community based organizations, whether formal or informal.
- b. Elected local bodies such as "panchayats".
- c. Voluntary Agencies (NGOs).
- d. Institutes/ Academic Organizations.
- e. Missions & Self-help Groups.
- f. Government, Semi-Government and autonomous Organizations.
- g. Associate/subsidiary companies
- h. Any other group, "samiti", organization.

PERMITTED AREAS OF CSR

Pursuant to Schedule VII of the Act and the CSR Rules, the Company shall endeavour, through its CSR Policy, to carry out CSR activities in respect of one or more of the following areas in India, for:-

- 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;
- promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;
- 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;
- 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 including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;
- 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 and handicrafts;
- measures for the benefit of armed forces veterans, war widows and their dependents Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- training to promote rural sports, nationally recognised sports, paralympic sports and Olympic sports;

- contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES 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;
- 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;
- rural development projects;
- slum area development.
- disaster management, including relief, rehabilitation and reconstruction activities.
- Any other CSR activity/ies as already specified and/or may be specified by the Central Government from time to time by amendment/s of CSR Rules and /or otherwise.

FORMATION OF CSR COMMITTEE

In terms of criteria mentioned in Section 135 of the Act, a Corporate Social Responsibility Committee {in short "CSR Committee"} consisting of following members has been constituted by the Board of Directors of the Company at their meeting held on the 07th February, 2014 and was last reconstituted on the 09th June, 2021 with following members:

Sr. No.	Name of the Members	Position
(i)	Shri Sushil Ansal	Chairman
(ii)	Smt. Jagath Chandra	Member
(iii)	Shri Satish Chandra	Member

AUTHORITY OF CSR COMMITTEE

An annual action plan in pursuance of its CSR 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 as specified in sub-rule (1) of rule 4;

- (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: and monitor the Corporate Social Responsibility Policy of the Company from time to time.

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.

New CSR initiatives

The CSR Committee shall have the authority to recommend to the Board for approval of any other CSR programmes or projects or activities not covered in this Policy which are within purview of the Companies Act, 2013, and rules thereunder as amended from time to time.

THRUST AREAS OF CSR IN TERMS OF SCHEDULE VII OF THE ACT

1. Promoting Education, literacy & Skill Development
2. Environment sustainability & protection
3. Healthcare/Medical care
4. Housing for Weaker Section of the Society & old age persons
5. Promotion & protection of culture / literature
6. Rural Developments etc.

All CSR activities have been and shall be identified in consultation with the related community which is to benefit/benefitting, in a participatory manner, wherever feasible.

GEOGRAPHICAL AREA OF CSR

The focus of CSR activities shall be generally in the vicinity of the projects and operations of the Company although that shall not be the limiting factor.

APPROVAL

CSR activities as identified by the Company shall be required to be put up to the CSR Committee, from time to time for approval and/or confirmation / ratification.

FUNDING AND ALLOCATION

For achieving its CSR objective, the Company through CSR Committee shall allocate for spending in every financial year, at least 2% of its average net profits made during the three immediately preceding financial years, as its Annual CSR Budget. It shall also decide the modalities of utilization of funds. Moreover mere contribution of funds, unless statutorily permitted, to any entity without the Company undertaking CSR activities through it will not be considered as CSR activities.

DISTRIBUTION OF ANNUAL CSR BUDGET AMONGST THRUST AREAS

Sr.No.	Thrust Area	% allocation
1	Promoting Education, literacy and Skill Development	20%
2	Environment sustainability & protection	10%
3	Healthcare/Medical facility	15%
4	Housing for Weaker Section of the Society & old age persons	05%
5	Promotion & protection of culture/ literature	05%
6	Rural Developments	45%

DETAILS OF THRUST AREAS FOR IMPLEMENTATION

The Company has already undertaken and/or shall undertake in terms of this Policy, CSR activities, in one or more areas, as follows:-

In **Education**, the endeavour is to • spark the desire for learning and knowledge at every stage through • schools • graduations • higher education • underprivileged children's education • sponsorship of vocational training programmes • generally all types of literacy • skill development projects.

In **Environment**, the aim is to • monitor and conserve water and electricity used across project sites of the Company • create awareness towards environment and resources conservation • green initiatives • projects having integrated environment protection • plantation of trees and others.

In **Health care**, the goal is to • render quality health care facilities {preventive and curative} to people living in the villages and elsewhere, particularly weaker sections of the society, old age persons and women • Primary health care centres • immunization programmes with a thrust on

polio eradication • programmes to address malnutrition • preventive health care through awareness programmes • blood donation camps • provision of health facilities to poor people • eye camps.

In **Housing for Economically Weaker Section of the Society {EWS} & old age persons**, the effort is to • allot plots to them in townships of the Company through open public lottery system at highly subsidized rates with easy interest free instalments • donation to establish senior citizen's home and providing free technical and engineering support for building • construction of roads • sanitation facilities.

In **Promotion & protection of culture/ literature**, the aim is to • encourage • literature • Hindi and other regional language authors • provide opportunity for authors • institute annual award to honour and felicitate the authors • promote ethics, principles and the philosophy of spiritualism and religious inclinations in the society • donations to temples & spiritual learning centre.

In **Rural Developments**, the endeavour is • adoption of villages connected to project sites of the Company • ensuring healthy and secured childhood for children through quality day care programmes aimed at holistic development • creating conducive conditions for women to work at the Company's project sites by providing them the necessary day care support for their children & crèche • providing opportunities for basic schooling skills • vocational training for women to make them economically self reliant • development of road work, sewer line, electrification work • creation of awareness & confidence to resist social taboos & instil self help.

SCHEDULES OF IMPLEMENTATION OF THRUST AREAS shall be reviewed by the CSR Committee and the Board of the Company, from time to time.

MONITORING & REPORTING FRAMEWORK

There shall be three levels of monitoring and review to be undertaken for CSR activities:-

Level {1}: Identified Local officers, at the project levels, who shall be entrusted with the responsibility of implementation, shall give monthly reporting to Level {2}.

Level {2}: Identified Senior Officers at the project levels who shall be entrusted with the responsibility shall review the progress, effective action plans and support. They shall give quarterly reporting to Level {3}.

Level {3}: CSR Committee shall review on a yearly basis and the Board shall also review on an annual basis.

The Committee shall, if needed, require the presence of the concerned officer/s before it, from time to time, to seek clarification/s, render advise/s and take appropriate decision/s to ensure effective and timely implementation of one or more CSR activities.

INFORMATION DISSEMINATION

The CSR Committee shall prepare an annual report on CSR, in the format prescribed under the Act and such report shall be included in the Board's report annexed to the financial statements. The report shall be signed by the Chairman of the CSR Committee, CEO/Director of the Company and such other person as may be prescribed.

The Government of India has come out with a new registration for NGOs who are undertaking or desirous of undertaking CSR activities on behalf of the companies. Such registration is to be taken by filing Form CSR-1 electronically on the MCA portal. This registration can be taken by NGOs with effect from April 1, 2021. The registration of Sushil Ansal Foundation, Kusumanjali Foundation by filing Form CSR-1 has already been done in compliance with the requirements, as mentioned above.

The Company shall host the contents of the CSR Policy on its website in such manner as may be prescribed.

AMENDMENTS

The CSR Committee is empowered to recommend amendments or modifications to the CSR Policy and such changes shall be placed before the Board for approval.

Where the CSR Policy is in variance with the requirements of the Act, the provision of the Act shall prevail.



Date: 12th August, 2021
New Delhi

Sushil Ansal
Chairman & Whole Time Director



100