

Corporate Social Responsibility Policy

1. Introduction :

Balajee Infratech and Constructions Private Limited ("The Company") considers Corporate Social Responsibility as a process for enhancing the lives of the community in which it operates and strongly believes in contributing towards social welfare of the people and the betterment of the society/ community at large, more specifically, for the deprived and the under privileged people.

This Corporate Social Responsibility Policy ("the CSR Policy") has been framed by the Company in accordance with Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 and such other rules, regulations, circulars as may be applicable and as amended/notified from time to time.

2. Corporate Social Responsibility Committee :

The Company has constituted Corporate Social Responsibility Committee ("the Committee") comprising of following Directors:

1. Mr. Mukesh Dokania- Member
2. Mr. Manish Dokania- Member
3. Mr. Manoj Dokania- Member
4. Mr. Ashish Dokania- Member

The Chairman/Chairperson will be appointed at every CSR Committee meeting of the Company.

The Board of Directors of the Company may re-constitute the Committee, as and when required to do so, by following the sections, sub-sections, rules, regulations, notifications issued or to be issued, from time to time, by the Ministry of Corporate Affairs or the Central Government of India. The Committee shall exercise powers and perform the functions assigned to it by the Board of Directors of the Company pursuant to section 135 of the Companies Act, 2013 and Companies (CSR Policy), Rules, 2014 notified with regard thereto.

3. Role of CSR Committee :

- The CSR Committee will play the following role in fulfilling the Company's CSR objectives:
 - a. Formulate and recommend to the Board, the Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII to the Companies Act, 2013 (the Act);
 - b. Recommend to the Board, the amount of expenditure to be incurred in a financial year on the activities referred to in clause (a);
 - c. Monitor the implementation of CSR Policy as provided herein;
 - d. Recommendation to the Board for modification(s) to the CSR Policy as and when required;
 - e. Any other matter as may be considered expedient in furtherance of and to comply with the CSR Policy of the Company.

4. Corporate Social Responsibility Activities :

- a. The Committee has approved the CSR Activities as mentioned under Schedule VII of the Companies Act, 2013. The Board of Directors has reviewed the said activities and express its consent to the Committee to pursue/ undertake the said activities under CSR policy of the Company under section 135 of the Companies Act, 2014, Schedule VII and other applicable rules, regulations, notifications etc., issued/to be issued from time to time.
- b. The Company may undertake any one or more the above activities as may be decided/recommended by the CSR Committee/Board from time to time depending on the suitable opportunities available and the need of the area concerned.
- c. The Company may undertake the CSR activities through eligible entities as mentioned under Rule 4(1) of the Companies (CSR Policy) Rules, 2014 and other applicable rules, regulations, notifications etc., issued/to be issued from time to time.
- d. The Company on recommendation of CSR Committee has formed a Public Charitable Trust in the name of "KESARI DEVI DOKANIA CHARITABLE TRUST" ("Trust"), registered under the Bombay Public Trust Act, 1950, and has obtained approval from MCA by filing e-form CSR-1 to undertake CSR activities. The trust is also registered under section 12A and 80G of the Income Tax Act, 1961.
- e. Out of approved CSR activities, the Committee shall decide which activity/project should be given priority for the respective financial year. While taking the decision of the activity/project to be undertaken for the respective year, the Committee shall analyze the basic need of the community/ area in which the Organization operates or at the place where its office is situated. The Committee shall record its findings and prioritized the CSR activities.

5. CSR Expenditure :

- a. The Company will spend atleast 2% of its average net profits made during the three immediately preceding financial years as per the stipulated provision of the Companies Act 2013 and other applicable rules and regulations.
- b. All reasonable efforts will be made to ensure that the annual CSR allocation is fully utilized in the respective year. However, if the Company fails to spend such amount, the Board of Directors shall, in its report under clause (o) of sub-section (3) of Section 134 of the Act, shall specify the reasons for not spending the amount.
- c. CSR expenditure will include all expenditure including contribution to corpus, for projects or programmes relating to CSR activities approved by the Board on the recommendation of its CSR Committee but does not include any expenditure on an item not in conformity or not in line with the activities which fall within the purview of Schedule VII to the Act.

6. RESPONSIBILITY OF THE BOARD OF DIRECTORS :

The Board of Directors will be responsible for:

- i. Constituting the CSR Committee through a Board resolution with defined composition;
- ii. Ensuring that for every financial year, the funds committed by the Company for CSR activities are utilized effectively and will monitor the implementation regularly; and
- iii. Disclosing in the Annual Report, the name of the CSR Committee members, the contents of the CSR Policy and ensure annual reporting of its CSR activities on the Company website.

- iv. Ensuring that only the activities as are included in the CSR Policy of the Company may be undertaken by the Company.
- v. Ensuring that while spending the amount earmarked for CSR activities, the Company gives preference to the local areas around it where it operates.
- vi. Ensuring that when the Company is unable to spend the required amount on the CSR activities, the said fact is disclosed in the Board's Report specifying the reasons for not spending the required amount.
- vii. Surplus arising out of the CSR activities will be utilized for the benefit of the community.

7. REVIEW AND REPORTING :

- a. The CSR Committee will review the CSR activities of the Company and will provide progress update to the Board of Directors every quarter or at such other intervals as deemed fit.
- b. The Company will report, the details of CSR initiatives and activities of the Company in the Director's Report in the format as stipulated in the Companies Act, 2013 and CSR Rules.

8. MONITORING :

- a. Appropriate documentation and amendment(s) to the CSR Policy, annual CSR activities reports on execution and expenditures will be undertaken on a regular basis.
- b. The Board / CSR Committee may also appoint any external agency for the purpose of measuring the impact of work done or a social satisfaction survey.

9. MANAGEMENT COMMITMENT:

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. Our Corporate Social Responsibility policy conforms to the relevant section of the Corporate Social Responsibility, Rules made under Companies Act, 2013 and amendment(s) to be made thereto in future.

The Company is contributing to sustainable development by its economic activities combined with the fulfillment of its social responsibilities.

- a. Donation to various Charitable Trusts, Hospitals and Schools
- b. Donation to Akshay Patra Foundation
- c. Donation to K.C. Mahindra Education Trust
- d. Donation to Tata Memorial Hospital
- e. Donation Various Government Fund

10. GENERAL :

- a. In case of any clarification on any matter including interpretation of this Policy, a reference can be made to the CSR Committee or Board of Directors of the Company. The decision of the CSR Committee/Board of Directors on all matters relating to this Policy, shall be final and binding on all concerned.

- b. The Board of Directors may, based on its assessment of the Company's needs, financial soundness, legal and regulatory development, and subject to compliance with the provisions of the Act / CSR Rules, at any time modify, vary, alter or amend this CSR Policy.
- c. This Policy is subject to continuous review and updates as may be required from time to time.

11. WEBSITE DISPLAY :

The Company shall display on its website (www.balajeeegroup.com), the contents of its CSR Policy and other information as may be required to be displayed.

For Balajee Infratech and Constructions Private Limited,

Mukesh Dokania
(Director)
DIN: 00486271

Manish Dokania
(Director)
DIN: 00486330

Manoj Dokania
(Director)
DIN: 00486434

Ashish Dokania
(Director)
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*This Policy has been revised in compliance to the provisions of Section 135 of the Companies Act, 2013, CSR Rules, 2014 and Companies (CSR Policy) Amendment Rules, 2021.