



**POLICY ON CORPORATE SOCIAL RESPONSIBILITY
OF
INFRASTRUCTURE ADVISORS PRIVATE LIMITED**



OVERVIEW



The CSR Policy sets out our commitment to ensuring that our activities extend beyond business and include initiatives and endeavors for the benefit and development of the community and society. The CSR Policy lays down the guidelines for undertaking programmes geared towards social welfare activities or initiatives. Through this CSR Policy, the Company proposes to adopt CSR programs and initiatives.

This CSR Policy has been framed in accordance with the applicable provisions of the Companies Act, 2013 (“Act”) and the rules issued thereunder.

Notwithstanding anything to the contrary contained in this CSR Policy but subject to applicable law, in the event that the Company fails to meet the thresholds set out under Section 135(1) of the Act for three consecutive financial years, it shall not be required to:

- a. Comply with the provisions of this CSR Policy; and
- b. Constitute / maintain the CSR Committee.

Till such time as it again meets the criteria specified in Section 135 (1) of the Act.

APPROACH OF IAPL FOR CSR

- IAPL is committed to undertake CSR activities in accordance with the provisions of Section 135 of the Companies Act, 2013, Schedule VII of the Companies Act, 2013 and Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 (“the Rules”).
- To pursue CSR programmes primarily in areas that falls within the economic vicinity of Company’s operations to enable close supervision and ensure maximum development impact. Community around the Company expects employment, development of infrastructure, care for the environment, educational institutions and other developmental activities from the Company operating around them. Beneficiaries of CSR activities develop a positive attitude towards the Company and help in promoting the brand value or goodwill of the Company.



- Partnering with Government and Social Welfare Organizations for achieving CSR objectives of IAPL.

CONSTITUTION OF CSR COMMITTEE

The Board of Directors of the Company shall constitute Corporate Social Responsibility Committee if required (“**CSR Committee**”) which will consist of a mix of managing / whole-time and independent director(s).

The CSR Committee to, inter alia, carry out the following functions;

- a. To formulate and recommend to the Board, a Corporate Social Responsibility Policy (“**CSR Policy**”) which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013 and the Rules made there under.
- b. To recommend the amount of expenditure to be incurred on the CSR activities.
- c. To monitor the implementation of framework of CSR Policy.
- d. In discharge of CSR functions of the Company, the CSR Committee shall be directly responsible to the Board for any act that may be required to be done by the CSR Committee in furtherance of its statutory obligations, or as required by the Board.
- e. To carry out any other function as mandated by the Board from time to time and / or enforced by any statutory notification, amendment or modification, as may be applicable, necessary or appropriate for performance of its duties.

Role of the Board of Directors:

The Board of Directors will, inter alia, be responsible for the following:

- a. After taking into account the recommendations made by the CSR Committee if any, approve the CSR Policy for the Company.
- b. Ensure that the activities included in Corporate Social Responsibility Policy of the Company are undertaken by the Company to the extent and in the manner considered appropriate.

In terms of section 135 of the Companies Act, 2013 and the Rules made thereunder, the Company is not required to constitute CSR Committee where the amount to be spent as per Section 135 (5) is not more than Rs. 50,00,000/-. In such case, the functions of such Committee provided under said section shall be discharged by the Board of Directors of such Company.

CSR POLICY & GUIDING PRINCIPLES

CSR Policy of IAPL is to undertake / provide support in the following activities as permitted from time to time under schedule VII of the Companies Act 2013:

- Eradicating hunger, poverty and malnutrition, promoting health care including 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 centers 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, agroforestry, 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 art 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 recognized 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 schedule caste, 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;
- 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 Organization (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).
- Rural development projects.
- Development of any area declared as SLUM by the Central Government or any State Government or any other competent authority under any law for the time being in force.
- Disaster management, including relief, rehabilitation and reconstruction activities

IMPLEMENTATION OF CSR ACTIVITIES

Company will implement CSR activities in either or / all of following ways:

- Company will implement CSR activities as per its policies decided by its Board either directly or through Panchayats / Trusts / Societies or Section 8 Companies (Companies with charitable objects etc.) operating in India and set up by it.



- Companies have also option to take up CSR activities through entities specified above but not set up by it.
- Company can also collaborate with other Companies in their CSR projects but those Companies must report CSR activities as per Rules.

The CSR Committee if any shall specify the tasks to be undertaken by such external agency, which may be undertaken in accordance with the Policy and processes of such agency. However, company will ensure the monitoring of these activities and maintain records of such monitoring.

CSR PLAN OF ACTION

The CSR Committee if any shall formulate a CSR plan listing out the programs to be undertaken and specify time frame & budget for such programs. This CSR plan is a part of the CSR Policy and may be amended by the CSR Committee if any as and when necessary. The Board will then consider and approve the CSR plan with or without any modification thereof.

CSR EXPENDITURE

IAPL shall spend a minimum of 2% of its average net profits made during the three immediately preceding Financial Years, calculated in accordance with Section 198 of the Act, in pursuance of its CSR Policy. Further, while spending the amount earmarked for CSR activities, preference should be given to local areas and areas around the Company where it operates. However, the Committee if any may identify such areas other than stated above, as it may deem fit, and recommend it to the Board for undertaking CSR activities.

Budgets for the CSR programs will be allocated in accordance with the Companies Act, 2013, Companies (Corporate Social Responsibility) Rules, 2014 as may be amended from time to time.

It shall be the duty and responsibility of the CSR Committee if any to see to it that the CSR programs and activities are carried out within the predetermined time and budget.

Details about the CSR programs undertaken by IAPL shall be displayed on its official website:

<https://www.infragroup.co.in/>

MONITORING

The CSR Committee if any shall monitor the implementation and progress of the approved projects through appropriate mechanisms such as site visits, review meetings and progress reports.

Annual Budgets shall be presented along with the list of approved CSR activities conducted by the Company to the CSR Committee if any together with the progress made from time to time.



Mechanisms to track data and monitor projects shall be established to ensure the transparency and efficiency of the implementation process. The projects shall be evaluated against the milestones defined in the implementation plan of the project.

REPORTING

CSR program details would be communicated in the public domain through the Annual Report in the reporting format as mandated by Section 135 of the Companies Act, 2013. Further, the CSR Policy may be modified, from time to time, by the Board of Directors of the Company on the recommendation of the CSR Committee if any.

The CSR Committee if any shall also submit a responsibility statement to the Board that the implementation and monitoring of the CSR policy is in compliance with the approved CSR policy of the Company.

Further, if the company fails to spend specified amount pertaining to CSR activities, then the Board of directors in its report shall specify the reason for not spending the amount. Also, such unspent amount shall be spent as per provision of Section 135 of Companies Act, 2013.

If the Company spends amount less than the amount prescribed under the act then such unspent shortfall amount shall be spent as per provision of Section 135 of Companies Act, 2013.

DISCLOSURE OF THE POLICY

The CSR policy recommended by the CSR Committee if any and approved by the Board shall be displayed on the website of the Company and any modifications carried out from time to time shall also be updated on the website of the Company respectively.

SURPLUS ARISING OUT OF CSR PROJECTS

Surplus arising out of the CSR projects or programs or activities, if any, shall be further used in development of CSR projects and shall not form part of the business profits of the company.

EXCLUSIONS

The CSR activities of the Company will not include the activities undertaken in pursuance of normal course of business of the Company. Any contribution directly or indirectly to any political party or any religious groups will not be considered as CSR activity.

MANAGEMENT'S COMMITMENT

Board of Directors of IAPL, CSR Committee if any and all employees at IAPL believe and act towards building a better society and sustainable resources.



AMENDMENT TO THE POLICY

The Board of Directors on its own and / or on the recommendation of CSR committee if any can amend any or all provisions of CSR Policy would be subjected to revision / amendment in accordance with the regulations on the subject as may be issued from relevant statutory authorities, from time to time.

Sr. No.	Particulars	Details
1.	Reviewed & recommended by	Not Applicable
2.	Approved by	Board of Directors
3.	Date of Approval by Board of Directors	21.03.2023
4.	Date of Last Amendment	Not Applicable
5.	Authorized Person with Signature	Sd/- Mr. Praveen Sethia

Words and expressions used and not defined in this policy shall have the same meanings respectively assigned to them in Companies Act, 2013 and rules made thereunder.