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Corporate Social Responsibility Policy of ANJ Turnkey Projects Private Limited (“ANJ” or “The Company”)

1. Introduction:

1.1 Purpose of the Policy:

ANJ Corporate Social Responsibility (“CSR”) policy has been developed pursuant to Section 135 of the Companies Act 2013 and relevant rules prescribed therein (“Act”).

1.2 Scope and Applicability

This Policy covers the proposed CSR activities to be undertaken by the Company and ensuring that they are in line with Schedule VII of the Companies Act, 2013 (“the Act”) as amended from time to time. It covers the CSR activities which are being carried out in India only and includes strategy that defines plans for future CSR activities.

The main objective of the CSR Policy is to lay down guidelines for the company to make CSR as one of the key focus areas to adhere to the Company’s interest in environment and society that focuses on making a positive contribution to society through effective impact and sustainable development programs.

2. CSR Vision and Mission:

Vision & Mission: To Promote sustainable and responsible business environment for the benefit of Society.

3. Eligible Programmes and CSR Budget

1. The CSR activities of the Company shall include but not limited to any or all of the sectors/activities as may be prescribed by Schedule VII of the Companies Act, 2013 as amended from time to time. Further, the Company will review the sectors/activities from time to time and make additions/ deletions/ clarifications to the above sectors/activities.
2. CSR Committee will recommend the programme wise expenditure to the Board for its consideration and approval as per the provisions of the Companies Act, 2013

4. CSR Governance and Implementation:

The Company would be carrying on its CSR programs / activities through MAGHARAM KULARIA FOUNDATION and the contributions made by the Company to Magharam Kularia Foundation will be utilized for CSR programs / activities on behalf of the Company.

With an Objective of keeping Charitable Objects in mind, Magharam Kularia Foundation was set up by the Company's Promoters on 3rd May, 2016. Magharam Kularia Foundation is actively involved in catering to the needs of the Society and uplifting the standard of living of those staying in rural areas / entire parts of the country. Magharam Kularia Foundation key focus would be on Rural Transformation, Education, Healthcare, Protection of Flora, Fauna and Cultural Heritage of India, Eradicating hunger, poverty and malnutrition, Promoting gender equality and empowering women, training to promote rural sports, nationally recognised sports etc.

The Company will continue to carry on its CSR programs / activities through Magharam Kularia Foundation.

5. Corporate Social Responsibility (CSR) Committee:

5.1 Constitution

Pursuant to the provisions of Section 135 of the Act, the Board of Directors shall constitute the Corporate Social Responsibility (CSR) Committee. The Members of CSR Committee shall be appointed by the Board of Directors of the Company which consists of 2 (Two) or more Directors. The Board may change the composition of the CSR Committee from time to time in such manner as it thinks fit.

5.2. Functions and Powers of Committee

To effectively implement the objectives of the Company with respect to CSR, the Committee is vested with the following functions and powers:

- 1) Formulate CSR Policy and recommend the same to the Board of Directors of the Company for approval.
- 2) Recommend CSR activities as stated under Schedule VII of the Act.
- 3) Approve to undertake CSR activities, if necessary, in collaboration with group companies/other Companies/firms/NGOs etc., and to separately report the same in line with the CSR Rules.
- 4) Recommend the CSR Budget.
- 5) Spend the allocated CSR amount on the CSR activities once it is approved by the Board of Directors of the Company in accordance with the Act and the CSR Rules.
- 6) Create transparent monitoring mechanism for implementation of CSR initiatives in India.
- 7) formulate and recommend to the Board, an annual action plan 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.

8) Submit the Reports to the Board in respect of the CSR activities undertaken by the Company

9) Monitor CSR Policy from time to time.

10) Monitor activities to ensure that the CSR activities of the Company are implemented effectively.

5.3. Meetings of the Committee:

1. The CSR Committee shall hold meetings at such intervals as the Board may feel necessary with at least one meeting in each financial year

2. The members of the Committee may mutually agree between them regarding time and place for the said meetings.

3. The Members of the Committee may participate in the meeting either in person or through video conferencing or other audio-visual means as may be convenient

6. CSR Budget & Expenditure:

1. The Companies Act 2013 mandates companies meeting the qualification criteria to allocate 2% of its average net profits (before tax) during the three immediately preceding financial years calculated as per Section 198 of the Companies Act, 2013 to be spent on CSR Activities that fall under purview of Schedule VII of the Act.

2. Net profit means profit more fully described under Rule 2(h) of the CSR Rules. The CSR expenditure shall include all expenditure including contribution to corpus or on projects or programs relating to CSR activities approved by the Board of Directors on the recommendation of its CSR Committee but does not include any expenditure on an item not in conformity or not in line with activities stated under Schedule VII of the Act.

3. The expenditure incurred towards administrative overheads and carrying out the Impact Assessment will be considered as part of CSR Expenses up to the limits prescribed under the applicable laws
4. Any amount remaining unspent at the end of the financial year, if any, except in case of an ongoing project, shall be transferred to a Fund to be specified in Schedule VII for this purpose, within a period of six months of the expiry of the relevant financial year
5. In case the Company undertakes any ongoing project, any amount remaining unspent and earmarked for the ongoing project, shall be transferred within a period of thirty days from the end of the financial year to a special account to be opened for that financial year in any scheduled bank to be called the 'Unspent Corporate Social Responsibility Account', and such amount shall be spent within a period of three financial years from the date of such transfer, failing which, the unspent amount shall be transferred to the Fund to specified in Schedule VII for this purpose, within a period of thirty days from the date of completion of the third financial year
6. Any surplus arising out of CSR projects, programmes or activities shall not form part of the business profits of the Company and shall be utilized towards the eligible CSR Activities / addressed in accordance with Applicable Laws.

7. Monitoring of CSR Activities:

The CSR Committee shall ensure effective implementation and monitoring of the projects approved by it from time to time in such manner as it deems fit. The Committee shall also ensure that a transparent monitoring mechanism is put in place.

8. Disclosures:

1. Details of composition of the CSR Committee, the CSR policy, the CSR Committee charter and details of CSR Activities approved by the Board shall be available on the Company website at www.anj.co.in
2. Annual report on CSR Activities shall be included in the Board's Report forming part of Company's Annual Report.

9. Policy review and amendment:

The Board of Directors may revise/ amend this CSR Policy based on the recommendations of the CSR committee from time to time, as may be required under the Companies Act, 2013 or the Rules framed thereunder.