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CSR ANNUAL ACTION PLAN

(For Financial Year 2022-23)

The Annual Action plan for Corporate Social Responsibility (CSR) prepared in compliance with Rule 5

(2) of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 read with The Companies (Corporate Social Responsibility Policy) Rules, 2014.

1. Objective

The objective of CSR initiative of the Company is to assist in building a society that offers an opportunity to develop the minimal socio-economic conditions needed to live a life of dignity. During the past years the main focus of the company for CSR expenditure was improvement in the quality of education and its infrastructure. The company has majorly focused on improving the infrastructure facilities in the primary Government Schools which were operating in the areas where the company is carrying out its business activities. These schools have been uplifted by the Company by providing various infrastructural facilities and e-learning teaching materials like setting up of smart classes, advanced computer labs, setting up of library, smart boards, ensuring safe drinking water and sanitation facility for students. This expenditure has started reaping the fruits and the number of students in these schools have increased. The company aims to continue to contribute part of its CSR budgets for the maintenance and upkeep of the schools already adopted by the company as per its CSR initiatives.

2. CSR Budget

As per Section 135(5) of the Companies Act 2013, the company is statutorily obligated to spend an amount of Rs. 30,00,000/- (Thirty Lakh Rupees Only) on CSR activities during the current financial year, or such higher amount as the Board may approve, on the recommendation of the CSR committee.

3. List of CSR Projects/ Programs to be undertaken as per Schedule VII of the Companies Act, 2013

| S. No | CSR project or activity identified | Sector in which the Project is covered | Activities | Specify the state where project/ Programme was undertaken | Specify the district where project/ Programme was undertaken | Amount outlay (budget) project or Programme wise (in Rs.) | Amount spent: Direct/ through implementing agency* |
|-------|------------------------------------|--|---|---|--|---|--|
| 1 | Promotion of education | Provide learning infrastructure and teaching material | -Sitting arrangement - Almirah - Library setup - Speaker - Indoor and Outdoor sport facilities - White/Green board | Uttar Pradesh | -Varanasi -Prayagraj -Chandauli -Lucknow | 13,90,000 | Direct |
| | | Electronic equipments to support better learning environment | -CCTV camera installation -Arrangement of ceiling fan | Uttar Pradesh | -Prayagraj -Chandauli -Lucknow | 1,00,000 | Direct |
| | | Set-up digital classrooms | -Set-up smart class | Uttar Pradesh | -Chandauli | 3,60,000 | Direct |
| | | Availability of Pure Drinking Water | -Installation of RO Machine -Installation of water cooler | Uttar Pradesh | -Chandauli | 1,50,000 | Direct |
| | | Painting and cleanliness of the school | -Wall painting -Cleanliness and sanitation | Uttar Pradesh | -Chandauli -Lucknow -Varanasi -Prayagraj | 2,00,000 | Direct |

| | | | | | | | |
|--|---|--|------------------------|---------------|----------|-----------|--------|
| 2 | Promotion of healthcare including preventive healthcare | Providing medical equipment and other infrastructural support to hospitals | -Supply of ventilators | Uttar Pradesh | -Lucknow | 8,00,000 | |
| Administrative expenses | | | | | | 1,50,000 | Direct |
| Total propose expenditure for FY-2022-23 | | | | | | 30,00,000 | Direct |

However, as per the proviso to Rule 5 of the Companies (Corporate Social Responsibility Policy) Amendment Rules 2021, the 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.

4. Manner of Execution

The CSR projects/programs shall be executed directly by the company through its own staff, under the directions of the CSR Head. The internal CSR department of the company shall be responsible for implementation of the CSR action plan on continuous basis. However, no intermediary, implementation agency or outside party is proposed to be engaged for the purpose of implementation of CSR projects.

5. Modalities of Utilisation of Funds

- The CSR budget of Rs. 30,000,00 lakhs shall be spent on promotion of education and healthcare as per the apportionment covered in para 3 above and subject to approval of the Board on the recommendation of the CSR Committee
- The funds for the activities shall be released upon the supply of the goods or services for the identified activity, subject to production of bills and verification of the supporting documents by the internal CSR department of the company. However, the company can make advance payments to the parties, or make the payments in tranches depending upon the size of transaction and nature which shall be adjusted with the final billing.

6. Implementation Schedule

It is proposed to start the implementation once the action plan is approved by the Board of Directors upon the recommendation of the CSR committee. Duration for CSR projects/programs will be of maximum one year which will be annually renewed on the basis of the project performance.

7. Monitoring and Reporting Mechanism

The Monitoring Mechanism of each project will differ on the basis of the nature of the project. All the projects will be monitored & evaluated as per the objectives & deliverables set for respective projects as per Board & Committee recommendation.

However, the committee shall ensure that the funds so disbursed have been utilized for the

purposes and in the manner as approved by it. For this purpose, the company shall circulate to the CSR committee, a monthly report on the progress made and expenses incurred. Further the Chief Financial Officer and Internal Auditor of the Company shall certify to that effect on half yearly basis and submit a utilization certificate with the statement, that the funds so disbursed have been utilized for the purposes and in the manner as approved by the Board and recommended by the CSR committee.

Furthermore, as per Rule 9 of the Companies (Corporate Social Responsibility Policy) Amendment Rules 2021, the composition of the CSR committee, CSR Policy and CSR Projects approved by the Board shall be placed on the website of the company, for public access and also disclosed in the Annual Report of the Company.

8. Details of need and impact assessment, if any

As per Rule 8(3) (a) of the Companies (Corporate Social Responsibility Policy) Amendment Rules 2021, since the company does not have an average CSR obligation of Rs. 10 Crore or more in the three immediately preceding financial years, therefore the company is not required to undertake an impact assessment through an independent agency.

- Although, An CSR Impact assessment is prepared by the CSR department.