

Corporate Social Responsibility Policy

PELATRO LIMITED

OBJECTIVE

The Company shall carry out the CSR activities in accordance with the provisions set out under Section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014, which require that at least 2% of the average net profits of the Company made during the three immediately preceding Financial Years shall be spent in pursuance of the Company's CSR Policy. The operating mechanism to carry out the CSR activities shall be as follows:

1. Taking up the activities as detailed in its focus area directly; or through
2. Any other company, trust, society, or any other entity as may be permitted by the applicable provisions.

Provided that the Company shall specify the project or programs to be undertaken through this entity, the modalities of utilization of funds on such projects and programs and the due diligence, monitoring and reporting mechanism.

Covenants

1. The CSR projects or programs or activities undertaken in India only shall amount to CSR expenditure.
2. The "Social responsibility" projects or programs or activities that benefit only the employees of the Company and their families shall not be considered as CSR activities except as those allowed by Government amendments from time to time.
3. Salaries / Remuneration paid to CSR staff as well as volunteers can be factored into CSR expenditure made by the Company as a part of the Administrative overheads. "Administrative overheads" shall mean the expenses incurred by the Company for 'general management and administration' of Corporate Social Responsibility functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme. The Board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the Company for the financial year as per rule 7(1) of the CSR Policy Rules, 2014.
4. Contribution of any amount directly or indirectly to any political party, shall not be considered as a CSR activity.
5. The surplus arising out of the CSR projects or programs or activities shall not form part of the business profit of the Company.

COMPANY'S FOCUS AREA/ACTIVITIES

- (a) Technology
- (b) Education
- (c) Healthcare
- (d) Other initiatives

DUE DILIGENCE MECHANISM

The Company personnel entrusted with the responsibility for CSR activities of the Company shall identify projects or programs to be undertaken, conduct due diligence, monitor impact and present before the Board an annual action plan for recommendation to Board for further approval.