

Corporate Social Responsibility Policy Framework **ROHAN HOUSING PRIVATE LIMITED**

CSR philosophy and vision

Corporate Social Responsibility" (CSR) is a way of conducting business, by which corporate entities visibly contribute to the social good. The essence of CSR is to integrate economic, environmental and social objectives with the company's operations and growth. CSR is the process by which an organization thinks about and evolves its relationships with society for the common good and demonstrate its commitment by giving back to the society for the resources it used to flourish by adoption of appropriate business processes and strategies. In its endeavors to mutually achieve the said objective, the Companies Act, 2013 stipulates the provisions regarding mandatory adherence to the Corporate Social Responsibility practices by the prescribed companies.

Social responsibility for us extends beyond Corporate Philanthropy and forms the very basis of our business ideology. As a responsible company, we are conscious in doing the business with human dignity, accountability and by respecting all the rules and legislations. CSR is rooted in our core values of quality, reliability, caring, trust and respect for others. We believe in thriving culture of continuous learning and development of all the stakeholders and the communities and therefore invest in them.

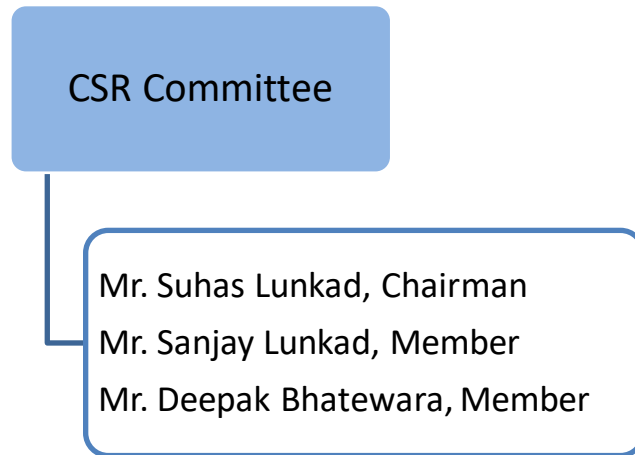
This CSR policy document mentions the details on undertaking the CSR programmes with reference to Section 135 of the companies Act 2013.

Objective of the policy

The policy intends to function as a self-regulating mechanism for the CSR activities and enable adherence to laws, ethical standards and international practices and achieve high standards of corporate governance.

Constitution of CSR Board and Committee

As per Section 135 and the Companies (Corporate Social Responsibility Policy) Rules, 2014 the following are the Directors who shall be the members of the CSR Committee.



Roles and responsibilities of Board and the committee

A transparent and robust governance structure has been put in place to oversee the implementation of the CSR Programs / Projects / Activities of the Company, in compliance with the requirements of Section 135 of the Companies Act 2013, CSR Rules 2014, and any other applicable laws, rules and regulations and as amended from time to time.

Rules and responsibilities of the Board of Directors in respect to Section 135 of the Companies Act:

The Board will provide management oversight and sound corporate governance by ensuring financial discipline and operational excellence. Summarized as follows:

Management oversight:

- Form a CSR committee
- Approve the CSR policy
- Ensure implementation of the activities under CSR
- Ensure CSR spending obligations
- Disclose reasons for not spending the amount (if applicable)

Financial discipline

- Ensure reporting and disclosure of CSR Policy, Committee members and Activities in the Annual Report as applicable
- Ensuring compliance with all applicable laws and regulations
- Sanction Programs, Projects and Activities of the company based on recommendations of the CSR Committee

Operational excellence

- Approving the company's CSR policy and review from time to time
- Ensure efficient execution of programmes, projects and activities through quarterly reviews
- Setting up any internal committee(s) as and when required

The Board shall review the company's CSR Policy at least once in a year and may amend the same as per the requirements of the Company. However, the Board may review and make changes to the Policy at any other intervals in case of any change in any of the applicable laws and regulations or if deemed necessary by the Board. As a good practice the company shall also conduct KYC (Know Your Client) with their existing implementing partner once in a year.

Roles and responsibilities of the CSR committee:

The Board will be supported by the CSR Committee as per the powers delegated by the Board. Major responsibilities of this committee are as follows.

- Formulate and recommend a CSR policy to the Board
- Recommend activities and the amount of expenditure to be incurred
- Monitor the CSR policy time to time
- Constitute transparent monitoring mechanism for ensuring implementation of the CSR projects and programmes.

CSR themes

Main theme

Which includes but not limited to the following; as per Schedule VII of the Companies Act 2013 :

a. Healthcare & Sanitation

-Eradicating hunger, poverty and malnutrition, promoting preventive health care and sanitation and making available safe drinking water.

b. Education, Livelihood & Skill Development

- Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects, assisting students in their studies, setting up hostels and day care centers for socially and economically backward groups and adopting measures for reducing inequalities.

c. Women Empowerment and Care for Senior Citizens

- 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.

d. Sustainability & Environment

- 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.

e. Rural Development

- Rural development projects. strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.

Other themes

- a.** Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of arts
- b.** Setting up public libraries

- c. Promotion and development of traditional arts and handicrafts
- d. Training to promote rural sports and nationally recognized sports
- e. Animal welfare

CSR Budget

As per the Companies Act, 2013, the Company shall allocate a budget for the CSR initiatives for every financial year, equivalent to 2% of its average net profits made during the previous three financial years as per Section 135(5).

The Company may collaborate or pool resources with other entities to undertake CSR activities.

In case of any surplus arising out of CSR programmes the same shall not form part of business profits of the Company and the amount will be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII.

Geographical areas and Implementation

Geographical areas of intervention

Being a building and construction company, it would implement its CSR projects mainly in and around their construction sites, however if justified it would consider other geographies as well in the State of India. The CSR Committee shall decide on location for the implementation of the CSR projects and activities within India.

Modes of implementation

The company will implement its programmes/ projects / activities through the following modes:

- Direct – self implementation or
- Through any of below or all:
 - a) Company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961 (43 of 1961), established by the company, either singly or along with any other company.
 - b) a company established under section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government;
 - c) any entity established under an Act of Parliament or a State legislature;
 - d) a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

A company may engage international organisations for designing, monitoring and evaluation of the CSR projects or programmes as per its CSR policy as well as for capacity building of their own personnel for CSR

A company may also collaborate with other companies for undertaking projects or programmes or CSR activities in such a manner that the CSR committees of respective companies are in a position to report separately on such projects or programmes

The Company may use services of expert agencies, consultants, any institutes or any other organizations wherever required for carrying out surveys, guidance on project design, on ground implementation, monitoring and evaluation, impact assessment or any other services as deemed necessary for successfully conducting the activities of the CSR or as recommended by the Board.

Monitoring and reporting framework

The Company can undertake CSR activities as per the provisions of the Companies Act, 2013. Accordingly, the Company shall support the Board and work closely with it and the CSR committee in implementing CSR activities of the Company. The CSR Committee will assist in identifying the areas, Programs and execution of initiatives as per defined guidelines.

The Company may receive requests for funding of projects throughout the year. Its panel of experts will evaluate proposals received under the Companies focus areas and projects will be prioritized by assessing their impact and then will forward its recommendation to the CSR Committee. The Committee will deliberate on proposals for implementation at its discretion. The financial approvals shall be done by the CSR Consultant or Manager who ever is appointed by the Company.

If need be, the Company will collaborate with stakeholders to monitor the status of each project and will report its findings to the CSR Committee Periodically.

The Board of a company shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the person responsible for financial management shall certify to the effect.

The company shall share the details of its Programs/Projects/Activities along with the financial details of the CSR funds with all relevant stakeholders in its Annual Report or in any other format and frequency as per any applicable statutory or regulatory requirements.

CSR Disclosure

The CSR Policy framework will be displayed on the website of the Company. The Board will include in its Board report, a report on the CSR activities in the format specified under the Companies (Corporate Social Responsibility Policy) Rules, 2014.