

CORPORATE SOCIAL RESPONSIBILITY POLICY

OBJECTIVE:

Elcid Investments Limited (“EIL” or “Company”) is committed to conduct its business in a socially responsible, ethical and environmentally friendly manner and to continuously work towards improving quality of life of the communities in its operational areas. The CSR policy of the company is laid out as under.

PURPOSE OF CORPORATE SOCIAL RESPONSIBLE (CSR) COMMITTEE:

Keeping in line with provisions Section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules 2014, as amended from time to time, the Board of Directors of the Company shall form a Corporate Social Responsibility Committee (hereinafter referred to as the “CSR Committee”) comprising of three or more directors out of which at least one director shall be an independent director, to inter alia, carry out the following primary functions:

1. Formulate the CSR Policy and recommend the same to the Board for its approval;
2. Formulate and recommend an Annual action plan along with Budgeted CSR Expenditure (including any revisions thereto) to the Board for its approval;
3. Identify projects of the Company as “Ongoing Projects”;
4. Recommend the annual CSR expenditure budget to the Board for approval;
5. Approve unbudgeted CSR projects where the annual outlay is more than Rs. 1 Crore but not exceeding 10% of the total CSR budget for the financial year;
6. Review implementation of CSR activities of the Company within the applicable framework;

COMPOSITION OF COMMITTEE:

The committee shall comprise of Mr. Mahesh Chimanlal Dalal, Independent Director of the company as its chairman and Mr. Varun Vakil, Mrs. Dipika Vakil as Members of the committee.

CSR ACTIVITIES:

The CSR projects and programs to be undertaken by the Company shall include activities falling within the preview of schedule VII of Companies Act, 2013, read with The

Companies (Corporate Social Responsibility Policy) Rules 2014, as amended from time to time. These programs will be executed by the Company and where appropriate in partnership with local government, various NGO partners, service providers and others.

The CSR projects of programs of the Company would broadly fall under 4 major themes – (1) Healthcare (2) Education & Vocational Skills and (3) Social Projects in the local area around Maharashtra (4) Contributions or funds provided to Technology Incubators located within academic institutions which are approved by Central Government. The projects, programs and their implementation modalities may be modified from time to time, as per recommendations of the CSR Committee of the Company.

IMPLEMENTATION:

Subject to the provisions of the Companies Act, 2013 as applicable from time to time, the Company may carry out its CSR activities:

- (a) Either by itself; OR
- (b) through such Implementing Agencies permitted under the Companies Act, 2013; OR
- (c) in collaboration with other Companies.

ANNUAL ACTION PLAN:

The CSR Committee of the Board of Directors of the Company shall on an annual basis, recommend an Annual Action Plan to the Board for its approval. The Annual Action Plan shall include:

- (a) the list of CSR projects or programs 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 programs;
- (c) the modalities of utilisation of funds and implementation schedules for the projects or programs;
- (d) monitoring and reporting mechanism for the projects or programs; and
- (e) details of need and impact assessment, required if any, for the projects undertaken by the company.

Further, the Board may during the year, at the recommendation of the CSR Committee alter such plans.

CSR EXPENDITURE & BUDGET:

1. CSR expenditure will include all amounts incurred/contributed by the Company towards its CSR Programs. CSR expenditure shall also include all direct and indirect expenditure incurred towards the CSR Programs as may be admissible under the regulatory framework.
2. In line with the requirements of the Companies Act, 2013 Administrative overheads i.e. all expenses towards “General Management and Administration” of CSR activities of the Company shall be capped at a maximum of 5% of total CSR expenditure. Further, these would not include expenses incurred by the Company towards designing, implementation, monitoring and evaluation.
3. The overall amount to be committed towards CSR will be approved by the Board of Directors as a part of its Annual Action Plan. Within the Budget the allocation towards specific CSR initiatives/projects will be approved by the CSR Committee of the Board. All projects undertaken by the Company shall be approved /ratified by the CSR Committee.
4. During any financial year, the Annual Action Plan of the Company may be modified to include any unbudgeted expenditure, either on account of new project(s) or due to increase in the outlay for approved project(s), with the prior approval of the CSR Committee.
5. Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall 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, within a period of six months of the expiry of the financial year.

MONITORING AND REPORTING:

1. Periodic monitoring and reporting will be done by the company to the best extent possible and will report its findings to the CSR Committee periodically.
2. The CSR initiatives / projects of the Company shall also be reported every year in the Annual Report of the Company.

DISCLOSURE:

The company shall disclose this Policy or such other information as required under section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules 2014, as amended from time to time and the CSR activities/projects conducted, every year in the Annual Report of the Company.

AMENDMENT:

Any or all provisions of the CSR Policy would be subject to revision / amendment by the Board of Directors of the Company based on the recommendations of the CSR Committee or else in accordance with the guidelines on the subject as may be issued, from time to time.