

MANJEERA CONSTRUCTIONS LIMITED CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Objective

The objectives of this policy are to directly or indirectly take up programmes that benefit the communities over a period of time, in enhancing the quality of life & economic well-being of the local public.

2. Need for a Corporate Social Responsibility (CSR) Policy

As per the provisions of section 135 & Schedule VII of the Companies Act, 2013, which is related to CSR activities Manjeera Constructions Ltd. (MCL) has prepared this policy on CSR.

3. CSR Vision

The core theme of the Company's CSR policy is giving back to the society from which it draws its resources by extending helping hand to the needy and the underprivileged.

CSR is the commitment of business to contribute for sustainable economic development by working with the employees, local community and society at large to improve their lives in ways that are good for business and development. It is the contribution of the corporate sector for philanthropic causes like education, health, water, environment and community welfare.

In alignment with vision of the company, through its CSR initiatives will continue to enhance value creation in the society, through its services, conduct & initiatives, so as to promote sustained growth of the society, in fulfilment of its role as a Socially Responsible Corporate, with environmental concern.

4. Areas of operation

MCL is a Construction and real estate Company engaged in the business of Construction of residential and commercial buildings mostly in the state of Telangana. Therefore, the Company would like to give preference to the areas in the states of Telangana for spending the amount allocated for CSR activities.

5. Board Responsibility

The Board of MCL will be responsible for:

- approving the CSR policy as formulated by the CSR Committee.
- ensuring that in each financial year the Company spends at least 2% of the average net profit (calculated as per Section 198 of the Companies Act, 2013) made during the three immediate preceding financial years.
- ensuring that every financial year funds committed by the Company for CSR activities are utilized effectively, and regularly monitoring implementation.
- disclosing in its Annual Report the names of CSR Committee members, the content of the CSR policy and ensure annual reporting of its CSR activities on the Company website.
- ensuring annual reporting of CSR policy to the Ministry of Corporate Affairs, Government of India, as per the prescribed format.
- As per Section 135 the reasons for under spending of the allocated CSR budget shall be specified in the Board's Report. The surplus arising out of the CSR activities, if

any, will not be considered as a part of the business profits of the company and the same will again spend for the CSR activities only.

6. CSR Committee

The CSR committee of MCL will consist of three or more directors of which, atleast one will be an independent director. The CSR committee will be responsible for:

- formulating the CSR policy in compliance to Section 135 of the Companies Act 2013.
- identifying activities to be undertaken as per Schedule VII of the Companies Act 2013.
- recommending to Board the CSR expenditure to be incurred.
- recommending to Board, modifications to the CSR policy as and when required.
- regularly monitoring the implementation of the CSR policy and monitoring the CSR activities.

7. Scope of the Activities

- i. Promoting education including special education and employment enhancing vocational skills especially among children, women & elders by the company directly or by funding Non-Government Organizations (NGO's) / Educational Institutions/Trusts/Organizations involved in Promotion of Education.
- ii. Promoting gender equality empowering women, establishing of old-age homes, day care centres and such other facilities for senior citizens and majors for reducing inequalities in socially and economically backward groups.
- iii. Eradicating hunger, Poverty and malnutrition, promoting healthcare and sanitation.
- iv. Relief to victims of Natural Calamities like Earth-quake, Cyclone, Drought & Flood situation in any part of the country.
- v. Water Supply including drinking water.
- vi. Environment protection, animal welfare, agro forestry, conservation of natural resources.

The above list is illustrative and not exhaustive. The CSR committee of Board of Directors is authorized to consider also CSR activities which are not included in this list. All activities under the CSR activities should be environment friendly and socially acceptable to the local people.

8. Approval of CSR Activities

All the CSR projects/activities shall be approved by CSR Committee of the Board and ratified by Board of Directors.

9. Allocation of funds

MCL shall spend in each financial year, at least 2% of the average net profits of the company made during the three immediately preceding financial years. The total budgetary allocation shall be approved by the Board of Directors Any unspent/unutilized CSR fund of a particular

year, shall be carried forward to the following year, i.e. the CSR budget will be non-lapsable in nature. However, the reason for not being able to spend shall be disclosed.

10. Institutional arrangement

The implementation and monitoring of the CSR activities shall be overseen by the CSR Committee of the Board. The day-to-day implementation shall be under the overall supervision of a senior level executive, one rank below the Board Level, who shall act as the Nodal Officer.

11. Planning, implementation & monitoring

The CSR policy is implemented as per the Act and the Rules. The CSR policy will be implemented ensuring that all projects/programmes as budgeted are duly carried out.

All the CSR activities shall be monitored regularly by Chairman, CSR Committee. Review discussions shall be held amongst the CSR committee members and suggestions for further improvements shall be discussed in details. The CSR committee shall ensure that benefits of all the activities reaches to the total cross section of the community.

12. Reporting

CSR Committee will be periodically intimated by Nodal Officer about the CSR activities and utilization of annual budget. The CSR Committee will in turn, periodically submit the reports to the Board of Directors for their information, consideration and necessary directions.

With effect from FY 2014–15 an Annual Report on CSR activities shall be included in the Board's Report as per the provisions of the Companies Act, 2013.

13. Contingency

Certain projects/activities which are not approved by CSR Committee but are required to be implemented on an urgent basis in unforeseen circumstances relating to Natural calamity, can be taken up for implementation after approval from Managing Director. The CSR Committee and Board of Directors would be appraised about such projects/activities during their next meeting.

14. General

a) The CSR Policy shall be recommended by the CSR Committee to The Board of Directors for its approval.

b) The Company reserves the right to modify, cancel, add, or amend any of the above rules/guidelines, with the approval of CSR Committee & ratification of Board of Directors.

c) Any or all provisions of the CSR policy shall be subject to revision/amendment in accordance with the guidelines on the subject as may be issued from Government of India, from time to time.

d) In case of doubt with regard to any of the provision of the policy and also in respect of matters not covered herein, the interpretation & decision of the CSR Committee shall be final.