

CAPRICON REALTY PRIVATE LIMITED
CORPORATE SOCIAL RESPONSIBILITY POLICY

1. Background:

While meeting the interest of our stakeholders, we believe in reaching out to underprivileged sections of the society and intend to make a positive difference to the society. Through our mite, we aspire to improve the quality of life of the weaker sections of the society by making available some basic necessities which are not easily available to them.

2. Activities:

At Capricon Realty Private Limited (CRPL), Corporate Social Responsibility (CSR) policy has effectively evolved from being engaged in passive philanthropy to corporate community investments, which takes the form of a social partnership initiative creating value for stakeholders.

CRL's commitment towards all its stakeholders is not just in principles but in practice. The Company continues to participate in several areas of social and environmental development that concerns its community. It entails having business policies that are ethical, equitable, environmentally conscious and sensitive to the societal needs.

The Company will use its funds mainly in any one or more of the following initiatives and activities under this CSR Policy:-

- Eradicating hunger, poverty and malnutrition, promoting preventative health care and sanitation including contribution to the Swachh Bharat Kosh set-up by the Central Government for the promotion of sanitation viz. building toilets for poor section of the society and making available safe drinking water.
- Promotion of education in particular for people in the backward area, tribals, building of schools, hostels & other educational facilities including special education and employment enhancing skills;
- 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 including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga;
- Social business projects;
- Measures for the benefit of armed forces veterans, war widows and their dependents;
- Trailing to promote rural sports, nationally recognized sports, paralympic sports and Olympic;

- Contribution to the Prime Minister’s National Relief Fund or any other fund set up by the Central Government or the State Governments for social-economic development and relief funds for the welfare of the scheduled castes, the scheduled tribes, other backward classes, minorities and women;
- Contributions or funds provided to technology incubators located within academic institutions which are approved by the Central Government
- Rural development projects
- *Such other matters as may be prescribed under applicable laws or any other activities as may be amended from time to time by the Ministry of Corporate Affairs in Schedule VII to the Companies Act, 2013 and
- Such other activities and initiatives as may be suggested by the Management of the Company and approved by the CSR Committee.

3. Constitution of the Committee

The Board of Directors of the Company has constituted CSR Committee consisting of three Directors as under:-

- (a) Mr. Raoul Thackersey,
- (b) Ms. Tanya Thackersey and
- (c) Ms. Vishwadhara Dahanukar (Independent Director)

4. Identification of CSR Initiatives and activities:

The CSR Committee may recommend the Annual Action Plan stating the CSR Activities; the amount to be spent per activity; Plan to be carried out by the Company directly by itself wholly or partially and/or through Registered Trusts / NGOs / Voluntary Organization.

The time period and/or duration cover which a particular CSR Initiative and Activity will be spread and depend on its nature, extent of coverage and the intended impact of the said initiative or activity which will be recommended by CSR Committee and approved by the Board.

CSR Initiatives and Activities which involve considerable financial commitment and are undertaken on a time frame of 2-5 years will be considered as ‘flagship programmes’ and accorded enhanced significance.

5. Implementation:

The Board of a Company may decide to undertake its CSR activities approved by the CSR Committee either directly wholly or partly or through a registered trust or a registered society or a Company established by the Company or its holding or subsidiary or associate company under Section 8 of the Act or otherwise;

Provided that –

(i) If such trust, society or company is not established by the Company or its holding or subsidiary or associate company, it shall have an established track record of three years in undertaking similar programs or projects which are registered with the Ministry of Corporate Affairs and meet the criteria as laid down under the Act and CSR Rules.

(ii) The Company has specified the project or programs to be undertaken through these entities, the modalities of utilization of funds on such projects and programs and the monitoring and reporting mechanism.

- A Company may also collaborate with other Companies for undertaking projects or programs or CSR activities in such a manner that the CSR Committee of the respective Companies are in a position to report separately on such projects or programs in accordance with the Rules.
- The 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.
- The Company may interchange the CSR Expenses amongst the different Projects.

6. Contribution:

- Ensure that in each financial year the Company spends at least 2% of the average net profits of the company made during the three immediately preceding financial years, calculated in accordance with Section 198 of the Act, in pursuance of its CSR policy.

Further, while spending the amount earmarked for CSR activities, preference should be given to local areas and areas around the Company where it operates,

7. Extent and Operation of the Policy

- The Policy should be read with and interpreted in accordance with the provisions contained in S. 135 of and Schedule VII to the Companies Act, 2013 and Companies (Corporate Social Responsibility) Rules, 2014. The powers, authorities and discretions granted under the said Act, Schedule and Rules shall vests with the CSR Committee/Board as the case may be and relevant provisions are deemed to have been incorporated in this CSR Policy.

8. Modification of the Policy

This CSR Policy is in substitution of all the existing Policy and the same have been approved by the Board upon the recommendation of the CSR committee at their meetings held on 9th February, 2021. The CSR Committee and/or the Board may, at their/its own discretion modify this policy or increase the scope of the activities in any manner and at any point of time.
