

# **CORPORATE SOCIAL RESPONSIBILITY POLICY**

**PURVANCHAL PROJECTS PRIVATE LIMITED**

**CIN: U70102DL2010PTC200716**

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## **CORPORATE SOCIAL RESPONSIBILITY POLICY**

### **PURVANCHAL PROJECTS PRIVATE LIMITED**

This Corporate Social Responsibility Policy (“the CSR Policy”) has been framed by Purvanchal Projects Private Limited (“the Company”) in accordance with Section 135, Schedule VII of the Companies Act, 2013, and CSR Rules issued by the Ministry of Corporate Affairs on February 27, 2014. Unless the context otherwise requires, the definitions mentioned in the notification dated February 27, 2014, and Companies Act 2013, shall apply to this CSR Policy.

#### **EMBRACING RESPONSIBILITY:**

At Purvanchal Projects Private Limited, we are dedicated to our role as a responsible corporate citizen. We understand the importance of integrating ethical, social, and environmental considerations into our business operations. Our CSR Policy reflects our commitment to sustainable development, community welfare, and environmental stewardship.

#### **REGULATORY INTRODUCTION**

In compliance with the requirements of Section 135 of the Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended, the Company is, inter alia, required to:

- (i) Constitute a Committee to formulate and recommend to the Board a Corporate Social Responsibility (CSR) Policy, recommend the amount of CSR expenditure and monitor the CSR activities of the Company from time to time.
- (ii) Ensure that the Company spends, in every financial year, at least two per cent of the average Net Profits before Tax (PBT) of the Company, made during the three immediately preceding financial years, in pursuance of its CSR Policy.

#### **COMPANY PHILOSOPHY FOR CSR POLICY:**

At **Purvanchal Projects Private Limited**, we view Corporate Social Responsibility (CSR) as an integral part of our identity. Our philosophy embodies a commitment to societal well-being, environmental stewardship, and ethical conduct. We believe that businesses have a profound responsibility to contribute positively to the communities they serve.

Our CSR philosophy is rooted in the following principles:

1. **Ethical Integrity:** We uphold the highest standards of ethical conduct in all our endeavors, ensuring transparency, honesty, and fairness in every interaction.

2. **Social Impact:** We recognize the power of our actions to effect positive change in society. Therefore, we actively seek opportunities to address social challenges, empower marginalized communities, and promote inclusive growth.
3. **Environmental Consciousness:** We are custodians of the environment and stewards of its resources. With this awareness, we are committed to minimizing our ecological footprint, conserving natural habitats, and promoting sustainable practices throughout our value chain.
4. **Stakeholder Collaboration:** We believe in the strength of partnerships and collaboration. By working closely with stakeholders, including employees, customers, suppliers, and local communities, we aim to co-create meaningful and sustainable solutions that benefit all.
5. **Continuous Improvement:** We embrace a culture of continuous improvement, constantly seeking ways to enhance the effectiveness and impact of our CSR initiatives. Through ongoing learning, innovation, and adaptation, we strive to be at the forefront of responsible business practices.
6. **Accountability and Transparency:** We hold ourselves accountable for the social and environmental consequences of our actions. Therefore, we are committed to transparent reporting, regular monitoring, and rigorous evaluation of our CSR activities, ensuring accountability to all stakeholders.

In essence, our CSR philosophy reflects our unwavering commitment to conducting business with compassion, integrity, and purpose.

### **Corporate Social Responsibility Programs and Projects**

The Company will carry on its CSR activities in areas or subjects as prescribed under Schedule VII of the Act, as amended from time to time. An illustrative list of such areas or subjects is outlined below:

- (i) eradicating hunger, poverty and malnutrition, promoting health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;
- (ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects.
- (iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.

- (iv) 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 setup by the Central Government for rejuvenation of river Ganga.
- (v) protection of National Heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts;
- (vi) measure for the benefit of armed force veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;

Classification: Public

- (vii) training to promote rural sports, nationally recognized sports, Paralympic sports and Olympics sport.
- (viii) contribution to the Prime Minister's National Relief Fund or Prime Minister's Central Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Schedule Tribes, other backward classes, minorities and women.
- (ix)
  - a. Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and
  - b. Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs)
- (x) Defence Research and Development Organisation (DRDO), Department of Biotechnology (DBT).
- (xi) rural development projects.
- (xii) slum area development. (areas declared as such by the Central Government or any State Government or any other competent authority under any law for the time

being in force.)

- (xiii) disaster management, including relief, rehabilitation, and reconstruction activities.
- (xiv) Any other activity as may be specified under the Act or the CSR Rules from time to time.

### **APPLICABILITY OF THE POLICY**

1. The Company's CSR Policy has been developed in conformity with the provisions of Section 135 of the Companies Act, 2013 (referred to as the Act in this Policy) and in accordance with the CSR Rules (hereby referred to as the Rules) notified by the Ministry of Corporate Affairs, Government of India.
2. This Policy shall apply to all CSR initiatives and activities taken up at the various locations in India, preferably in the vicinity where the Company carries out its business operations and for the benefits of different segments of the society, specifically the deprived and under-privileged.

### **OBJECTIVE OF THE CSR POLICY**

These objectives serve as a compass, guiding our CSR initiatives towards meaningful impact and positive change. The key objectives of our CSR Policy are:

1. **Sustainable Business Practices:** To ensure that Company operates its business in a manner that is economically, socially, and environmentally sustainable. We strive to integrate responsible practices into our operations, supply chain management, and business strategy, thereby minimizing negative impacts and maximizing positive contributions to society and the environment.
2. **Community Development:** To actively contribute to the well-being and development of the communities in which we operate. We seek to address key societal challenges such as poverty alleviation, education enhancement, healthcare accessibility, and livelihood creation, thereby empowering communities to thrive and prosper.
3. **Stakeholder Engagement:** To foster meaningful engagement with our stakeholders, including employees, customers, suppliers, shareholders, and local communities. We recognize the importance of listening to and understanding the needs, concerns, and expectations of our stakeholders, and strive to incorporate their input into our CSR initiatives and decision-making processes.
4. **Enhanced Quality of Life:** To improve the quality of life of individuals and families residing in the vicinity of our operations. Through targeted CSR interventions, we aim to uplift living standards, enhance access to basic amenities, promote gender equality, and empower marginalized groups, thereby creating a more inclusive and equitable society.

5. **Brand Reputation and Trust:** To strengthen the reputation and trust of Purvanchal as a responsible corporate citizen. We believe that by demonstrating our commitment to CSR, we can enhance our brand value, build stronger relationships with stakeholders, and foster a positive corporate image both locally and globally.
6. **Compliance and Governance:** To ensure compliance with relevant laws, regulations, and international standards pertaining to CSR. We are committed to upholding the highest standards of corporate governance, transparency, and accountability in our CSR practices, and strive to be a role model for ethical conduct and responsible business behavior within the industry.

#### **CORPORATE SOCIAL RESPONSIBILITY COMMITTEE COMPOSITION:**

The Company has constituted Corporate Social Responsibility Committee ("the Committee") comprising of following:

1. Shah Alam - Managing Director
2. \*Aftab Alam - Director
3. \*Shahin Shah Alam-Director

Board of Directors of the Company may re-constitute the Committee, as and when required to do so, by following the sections, sub-sections, rules, regulations, notifications issued or to be issued, from time to time, by the Ministry of Corporate Affairs or the Central Government of India. The Committee shall exercise powers and perform the functions assigned to it by the Board of Directors of the Company pursuant to section 135 of the Companies Act, 2013 and CSR Rules notified with regard thereto.

*\* Mr. Aftab Alam's resignation from committee w.e.f 23rd of January, 2023.*

*\*Miss. Shahin Shah Alam appointed as a Committee member w.e.f 23rd of January, 2023*

#### **MEETINGS:**

The Committee shall hold meeting as and when required, to discuss various issues on implementation of the CSR Policy of the Company. The members would thrive to hold at least two meetings in a financial year.

The Committee shall periodically review the implementation of the CSR Programmes and issue necessary direction from time to time to ensure orderly and efficient execution of the CSR programmes in accordance with this Policy. It would be the responsibility of the CSR Committee to periodically keep the Board apprised of the status of the implementation of CSR activities.

#### **ROLE OF CSR COMMITTEE:**

- a) To formulate and recommend to the Board, a Corporate Social Responsibility Policy which shall indicate the activities to be undertaken by the Company as specified in Schedule VII of the Companies Act, 2013 (as amended from time to time).

- b) To recommend the amount of expenditure to be incurred on the activities in a financial year.
- c) To monitor the Corporate Social Responsibility Policy of the company from time to time.
- d) Any other matter/thing as may be considered expedient by the Members of the Committee in furtherance of and to comply with the CSR Policy of the Company

### **RESPONSIBILITIES OF THE BOARD**

The Board of Directors is entrusted with the following responsibilities regarding Corporate Social Responsibility (CSR):

1. **Formation of CSR Committee:** The Board shall establish a CSR Committee and disclose its composition to ensure robust oversight of CSR initiatives.
2. **Approval of CSR Policy:** Upon considering recommendations from the CSR Committee, the Board shall approve the CSR Policy, underscoring its commitment to social responsibility.
3. **Transparency through Website:** The Board shall ensure that the CSR Policy is made available on the Company's website, fostering transparency and accessibility.
4. **Implementation Oversight:** It is incumbent upon the Board to oversee the effective implementation of CSR activities, aligning them with the Company's objectives and societal needs.
5. **Expenditure Compliance:** The Board shall ensure the expenditure of the requisite amount on CSR activities annually, in adherence to legal obligations.
6. **Disclosure of Reasons:** In the event of unspent CSR funds, the Board shall disclose the reasons in the Annual Report, demonstrating accountability to shareholders.
7. **Administrative Oversight:** To uphold efficiency, the Board shall ensure that administrative overheads do not exceed 5% of the total CSR expenditure.
8. **Utilization Certification:** The Board, in conjunction with the CSR Committee, shall verify that disbursed funds are utilized as approved, with certification by the Chief Financial Officer.
9. **Unspent Amount Transfer:** Upon approval, the Board shall authorize the transfer of unspent CSR funds in accordance with legal requirements. The Accounts and Finance Team shall facilitate this process, maintaining transparency and compliance.

## **IMPLEMENTATION IDENTIFICATION AND SELECTION OF PROGRAMMES**

The Company shall implement the identified CSR Projects by the following means:

### **I. Direct Method**

1. **Internal Implementation:** The Company may undertake the execution of identified CSR Projects itself, aligning with the predefined Thrust Areas outlined in the Policy.
2. **Utilization of Trust/Society/Section 8 Company:** Alternatively, the Company may opt to implement identified Projects through its own Trust, Society, or Section 8 Company dedicated to CSR activities, ensuring alignment with the designated Thrust Areas specified in the Policy.
3. **Engagement of External Professionals/Firms/Agencies:** The CSR Officer may enlist the expertise of external professionals, firms, or agencies, if necessary, to facilitate the implementation of CSR Projects effectively.
4. **Collaboration with Other Companies:** In certain instances, the Company may collaborate with other companies, including its Group Companies, to fulfill its CSR objectives through the Direct method. However, such collaborations will be contingent upon the assurance that the CSR Committees of the respective companies are capable of independently monitoring these CSR Projects.

## **PARTNERSHIPS TO IMPLEMENT THE PROGRAMMES**

Collaborative Partnerships may be formed with the Government Agencies, the village Panchayats, NGOs and other like-minded stakeholders. This would help widen the Company's reach and leverage upon the collective expertise, wisdom and experience that these partnerships bring to the table.

## **CRITERIA FOR IDENTIFYING EXECUTING PARTNERS**

In case of programme execution by NGOs/Voluntary organizations the following minimum criteria should be required to be ensured:

1. **Presence in India:** The NGO/Agency must maintain a permanent office/address within India.
2. **Legal Status:** It should be a registered public Trust or Society with a duly executed Trust Deed/Memorandum of Association.
3. **Registrations:** The organization must possess registration certificates under relevant sections of the Companies Act, 2013, Income Tax Act, 1961, including Section 12A and Section 80G. Additionally, registration under the Foreign Contribution Regulation Act (FCRA) is mandatory where applicable, along with any other relevant registrations.
4. **Permanent Account Number (PAN):** A valid PAN issued by the Income Tax Department is required.



5. **Financial Audits:** Submission of audited financial statements for the last three years is mandatory to assess financial stability and accountability.
6. **Income Tax Returns:** The organization should provide income tax returns for the past three years to demonstrate compliance with tax regulations.
7. **FCRA Returns (if applicable):** For organizations registered under FCRA, submission of FC returns for the last three years is necessary.
8. **Verification of Antecedents:** The antecedents of the NGO/Agency must be verifiable and subject to confirmation to ensure credibility and integrity.
9. **Professional Expertise:** The organization should possess a team of professionals with the requisite expertise to manage projects effectively and maintain accurate financial records and program reports.
10. **Non-competition Agreement:** The NGO/Agency should not have any tie-ups with competitors of the Company to prevent conflicts of interest.

## CSR ANNUAL ACTION PLAN

### 1. Eradicating Hunger, Poverty and Malnutrition:

- **Mid-day meals program-** Provide nutritious mid-day meals to students from underprivileged backgrounds in target schools to combat hunger and encourage regular school.
- **Nutrition Camps-** Organize community-based nutrition and health awareness camps focusing on children, women and elderly members in underserved areas.
- **Basics necessities support-** Distribute essentials items such as food packets, hygiene kits, clothing, and school supplies to families below the poverty line.

### 2. Promoting education:

- **Infrastructure development for schools-** Construct and renovate school buildings in remote and underserved areas, incorporating eco-friendly, inclusive, and accessible designs
- **Provision of educational resources-** Equip schools with books, uniform, e-learning tools, classroom furniture
- **Digital literacy programs-** Introduce computer literacy and digital educational modules

### 3. Promoting gender equality and empowering women:

- **Girl child education campaign-** Special initiatives to support the education of girls through scholarship, awareness drives and provision of separate sanitation facilities in schools.

- **Skill development for women-** Organize skill development, vocational training and entrepreneurship workshops for adolescent girls and women in the community.
- **Sensitization and safety program-** Conduct gender sensitization workshops for students , parents , and teachers to promote , respect and safe spaces in schools.
- **Green school infrastructure-** Integrate rainwater harvesting solar panels, energy-efficient lighting, and waste segregation in school design to promote environmental consciousness.
- **Tree Plantation Drives-** Initiate regular tree plantation drives involving students and local communities to improve green cover around school and public spaces.
- **Environmental Education-** Include modules on climate change, biodiversity, and sustainability in school curricula and extracurricular programs.

#### 4. Protection Of National Heritage, Art And Culture

- **Culture and Heritage Awareness Programs-** Organize exhibitions, storytelling sessions, and educational trips relate to India's culture heritage, especially for underprivileged students.
- **Preservation Projects-** Collaborate with local authorities to participate in restoration or awareness campaigns for heritage structures or traditional arts in the region.

#### 5. Measure for the benefit of armed forces veterans, war window and dependents

- **Education Support to Families Of Armed Forces-** Provide scholarships, free coaching career counselling to children of armed forces veterans and war window
- **Skill and Entrepreneurship Training-**Offer vocational training and entrepreneurship workshops to war window and dependents for livelihood generation.
- **Welfare Support-** Conduct periodic welfare camps and community engagements in region with a high concentration of armed forces families.

## 6. Disaster Relief and Rehabilitation (Natural Calamities & War Impact)

- **Immediate Relief Measures**-Undertake prompt distribution of relief materials such as food, drinking water, medicines, clothes, and temporary shelters during **floods and natural disasters**.
- **Rehabilitation Projects**-Support long-term rehabilitation programs including housing repair, school rebuilding, and restoration of community facilities in disaster-hit areas.
- **Psychosocial and Health Support**- Provide counseling and healthcare support to victims of natural calamities and families of **armed forces personnel** impacted by conflict situations.
- Welfare of War Widows and Families of Armed Forces Personnel
- **Educational Support for Children of Martyrs**- Provide scholarships, school kits, and mentoring for children of **war widows and deceased armed forces personnel**.
- **Livelihood Programs for War Widows**- Facilitate skill-building, micro-enterprise support, and self-employment opportunities tailored to war widows.
- **Healthcare and Psychological Support**- Extend medical aid, wellness services, and counseling to war widows and their families coping with loss and transition.
- **Housing and Community Support**- Assist with affordable housing, legal aid, and community integration for war widows in collaboration with government schemes.

### REVIEW PERIODICITY AND AMENDMENT

The CSR Plan may be revised, modified, or amended by the CSR Committee at such intervals as it deems appropriate.

The CSR Committee shall review this Policy at least once every two years, or earlier if deemed necessary.

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