

Corporate Social Responsibility Policy of Aurum PropTech Limited

Issue Date : 1st June 2015 (modified last on July 23, 2021)

Office of Origin : CSR Committee

Policy Approval Authority : Executive Director

Objective:

The Corporate Social Responsibility Policy (CSR) policy is being developed for the organisation to comply with the provisions of section 135 of the Companies Act 2013, **Companies (Corporate Social Responsibility Policy) Rules 2014 and Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021**. We are committed to spending up to 2% of the average net profit for the preceding three financial years on CSR projects or programs related to activities specified in Schedule VII to the Act or such activities as may be notified from time to time.

A CSR committee was constituted as per approval by Board of Directors to meet the requirements of the act.

CSR Activities

The CSR programs of Aurum PropTech Limited fall under the following categories as per schedule VII of the Companies Act, 2013.

- (i) Eradicating hunger, poverty and malnutrition, [“promoting health care including preventive health care”] and sanitation [including contribution to the Swachh 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 set-up 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 art and handicrafts;

- (vi) measures for the benefit of armed forces veterans, war widows and their dependents, [Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows];
- (vii) training to promote rural sports, nationally recognised sports, paralympic sports and olympic sports
- (viii) contribution to the Prime Minister's National Relief Fund [or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund)] or any other fund set up by the Central Government of India for socio economic development and relief and welfare of the schedule caste, 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) rural development projects
- (xi) slum area development.
- (xii) disaster management, including relief, rehabilitation and reconstruction activities.

It shall not include following item namely –

- (a) activities undertaken in pursuance of normal course of business of the company: Provided that any company engaged in research and development activity of new vaccine, drugs and medical devices in their normal course of business may undertake research and development activity of new vaccine, drugs and medical devices related to COVID-19 for financial years 2020-21, 2021-22, 2022-23 subject to the conditions that-
 - such research and development activities shall be carried out in collaboration with any of the institutes or organisations mentioned in item (ix) of Schedule VII to the Companies Act;
 - details of such activity shall be disclosed separately in the Annual report on CSR included in the Board's Report;

(b) any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;

(c) contribution of any amount directly or indirectly to any political party under section 182 of the Act;

(d) activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);

(e) activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;

(f) activities carried out for fulfilment of any other statutory obligations under any law in force in India;

Monitor the Policy of the company from time to time.

The Board of Directors of the company may undertake CSR activities approved by the CSR committee directly through Aurum Foundation or as may be decided by Committee from time to time. The Board, through its CSR committee, plans and monitors expenditure and reports outcomes of such CSR projects or programmes or activities. The implementation schedules of each CSR project is executed as proposed in the form submitted to the Board.

CSR Unspent Amount

Until a fund is specified in Schedule VII for the purposes of subsection (5) and(6) of section 135 of the Act, the unspent CSR amount, if any, shall be transferred by the company to any fund included in schedule VII of the Act.”.

Activities undertaken in the normal course of business will not be a part of CSR activities.

CSR Expenditure

1. The board shall ensure that the administrative overheads shall not exceed five percent of total CSR expenditure of the company for the financial year.
2. 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.
3. Where the Company spends an amount in excess of requirement provided under subsection (5) of section 135 , such excess amount may be set off against the requirement to spend under sub-section (5) of section 135 up to immediate succeeding three financial years subject to the conditions that –

- (i) the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any, in pursuance of sub-rule (2) of this rule.
 - (ii) the Board of the company shall pass a resolution to that effect.
4. The CSR amount may be spent by the Company for creation or acquisition of a capital asset, which shall be held by –
 - a. a company established under section 8 of the Act, or a Registered Public Trust or Registered Society, having charitable objects and CSR Registration Number under sub-rule (2) of rule 4; or
 - b. beneficiaries of the said CSR project, in the form of self-help groups, collectives, entities; or
 - c. a public authority: Provided that any capital asset created by the Company prior to the commencement of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, shall within a period of one hundred and eighty days from such commencement comply with the requirement of this rule, which may be extended by a further period of not more than ninety days with the approval of the Board based on reasonable justification”.

CSR Committee

Composition:

In compliance with the rules laid down under the Companies Act 2013, the composition of the CSR Committee of the company is as under:

- The CSR Committee of the Board of Directors comprises three **directors, two of whom are independent.**
- The Chairperson of this committee is an independent director.
- The composition of the CSR committee will be disclosed in the Board's report.

Roles and Responsibilities:

- Decide CSR projects or programmes or activities to be taken up by the Company.
 - Place before the Board the CSR activities proposed to be taken up by the Company for approval each year.
 - Oversee the progress of the initiatives rolled out under this policy every quarter.
 - Define and monitor the budgets for carrying out the initiatives.
 - Submit a report to the Board of Directors on all CSR activities during the Financial Year. This will be displayed on the company's website -- www.aurumproptech.in
 - Monitor and review the implementation of the CSR policy.
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- The committee is supported by the CSR team for the implementation of approved projects.

Monitoring

The Board of the company shall after taking into account the recommendations made by the CSR Committee, approve the policy for the company and disclose contents of such Policy in its report and also place it on the company's website and ensure that the activities as are included in the CSR Policy of the company are undertaken by the company.

Policy Performance Review

The CSR Committee reviews the CSR policy annually and makes recommendations for revisions to it if required, with the approval of the Board.

All employees and stakeholders are made aware of the objectives, targets and programmes and the obligations to be followed in the performance of their tasks. This ensures that the policy is supported and maintained.